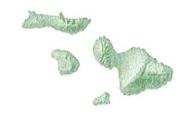
MICHAEL P. VICTORINO Mayor

> LORI TSUHAKO Director

LINDA R. MUNSELL Deputy Director





DEPARTMENT OF HOUSING & HUMAN CONCERNS COUNTY OF MAUI 2200 MAIN STREET, SUITE 546 WAILUKU, MAUI, HAWAI'I 96793 PHONE: (808) 270-7805

May 12, 2022

Mary Alice Evans, Director State of Hawai'i Office of Planning and Sustainable Development Environmental Review Program 235 South Beretania Street, Room 702 Honolulu, Hawai'i 96813

Dear Ms. Evans:

SUBJECT: FINAL ENVIRONMENTAL ASSESSMENT PREPARED FOR THE KUIKAHI VILLAGE PROJECT, LOCATED IN WAILUKU, MAUI,

HAWAI'I; TMK NO. (2)3-5-002:003 (por.)

With this letter, the County of Maui, Department of Housing and Human Concerns hereby transmits the Final Environmental Assessment and Finding of No Significant Impact (FEA-FNSI) for the proposed Kuikahi Village Project in Wailuku, on the island of Maui, for publication in the next available edition of the Environmental Notice.

Enclosed are an Adobe PDF file of the FEA-FNSI and a zip file that contains the shapefile of the project's location. The publication form was submitted through the online portal.

If there are any questions, please contact Charlene Shibuya of Munekiyo Hiraga at (808) 244-2015 extension 219 or Buddy Almeida of the Housing Division at (808) 270-7351.

Sincerely,

LORI TSUHAKO, LSW, ACSW

Director of Housing and Human Concerns

Enclosures

CC.

Buddy Almeida, Department of Housing and Human Concerns (w/o enclosures)

Doyle Betsill, Kuikahi Properties LLC (w/o enclosures)

Lawrence Carnicelli, Kuikahi Properties LLC (w/o enclosures)

Charlene Shibuya, Munekiyo Hiraga (w/o enclosures)

From: webmaster@hawaii.gov

To: <u>DBEDT OPSD Environmental Review Program</u>

Subject: New online submission for The Environmental Notice

Date: Friday, May 13, 2022 9:38:51 AM

Action Name

Proposed Kuikahi Village Project

Type of Document/Determination

Final environmental assessment and finding of no significant impact (FEA-FONSI)

HRS §343-5(a) Trigger(s)

• (1) Propose the use of state or county lands or the use of state or county funds

Judicial district

Wailuku. Maui

Tax Map Key(s) (TMK(s))

(2)3-5-002:003(por.)

Action type

Applicant

Other required permits and approvals

State District Boundary Amendment and Maui County Code Chapter 2.97 Affordable Housing Application (Maui County Council); Chapter 11-46, Community Noise Control; Chapter 11-60.1-33, Fugitive Dust; NPDES; Construction permits (building, grading); Work on County Roadway approval

Discretionary consent required

Not Applicable

Approving agency

County of Maui, Department of Housing and Human Concerns

Agency contact name

Lori Tsuhako

Agency contact email (for info about the action)

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Applicant address

191 Waihee Valley Road Wailuku, Hawaii 96793 United States Map It

Was this submittal prepared by a consultant?

Yes

Consultant

Munekiyo Hiraga

Consultant contact name

Charlene Shibuya

Consultant contact email

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Consultant contact phone

(808) 244-2015

Consultant address

305 High Street, Suite 104 Wailuku, Hawaii 96793 United States Map It

Action summary

Kuikahi Properties, LLC proposes a new residential community to include a variety of residence types such as multi-family, duplex, townhome, live-work, tiny home, and single family units on an approximately 14.9-acre portion of land in Wailuku, Maui. The proposed development also involves a minor residential business component through the live-work units, which are envisioned to be for neighborhood services or office types of businesses. The proposed project will be comprised of 202 residential units anticipated for sale at affordable levels per the Area Median Income. Related improvements to be developed with the project include onsite parking for residents and visitors, internal roadways and sidewalks, bike paths, landscaping, a pavilion, playground, spot parks, drainage improvements, underground utility connections, and 2 access connections to Ku'ikahi Drive. A roundabout at the intersection of Ku'ikahi Drive and Kehalani Mauka Parkway is proposed.

Reasons supporting determination

Refer to Chapter IX. Significance Criteria Assessment of EA document.

Attached documents (signed agency letter & EA/EIS)

- FONSI-Letter-for-FEA_2022-05.12.pdf
- Kuikahi_May_2022.Final-EA-Volume-I-of-II.pdf
- Kuikahi_May_2022.Final-EA-Volume-II-of-II.pdf

Shapefile

• The location map for this Final EA is the same as the location map for the associated Draft EA.

Action location map

• Kuikahi Project Boundary.zip

Authorized individual

Charlene Shibuya

Authorization

• The above named authorized individual hereby certifies that he/she has the authority to make this submission.

VOLUME I OF II

Final Environmental Assessment

KUIKAHI VILLAGE PROJECT WAILUKU, MAUI, HAWAI'I

TMK NO. (2)3-5-002:003 (POR.)

Prepared for:

Kuikahi Properties, LLC

Approving Agency:

County of Maui,
Department of Housing and Human Concerns

May 2022

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VOLUME I OF II

Final Environmental Assessment

KUIKAHI VILLAGE PROJECT WAILUKU, MAUI, HAWAI'I

TMK NO. (2)3-5-002:003 (POR.)

Prepared for:

Kuikahi Properties, LLC

May 2022

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Executive Summary

Proposed Kuikahi Village Affordable Housing Project

Project Name:

Type of Document: Final Environmental Assessment **Legal Authority:** Chapter 343, Hawai'i Revised Statutes **Anticipated Determination:** Finding of No Significant Impact (FONSI) **Applicable Environmental** Use of County lands for roadway improvements Assessment review "Trigger": Location: Maui Island Wailuku TMK No. (2)3-5-002:003(por.) Landowner: Kuikahi Properties, LLC Applicant: Kuikahi Properties, LLC Contact: Doyle Betsill 191 Waihe'e Valley Road Wailuku, Hawai'i 96793 **Approving Agency:** County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793 Consultant: Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawai'i 96793 Contact: Charlene Shibuya Phone: (808) 244-2015 Kuikahi Properties, LLC proposes a new residential **Project Summary:** community to include a variety of residence types such as multi-family, duplex, townhome, live-work, studio, and single-family units on an approximately 14.9-acre portion of land identified as Tax Map Key (2)3-5-002:003 in Wailuku, Maui, Hawai'i. The proposed development also involves a minor commercial component through the live-work units, which are

envisioned to be for neighborhood services or office-

types of businesses. The site is located mauka of Honoapi'ilani Highway, which is located to the east, and adjacent to Ku'ikahi Drive, which borders the site to the north. Beyond Ku'ikahi Drive to the north is the Kehalani Master Plan development which includes existing residential homes, park areas and a public elementary school. There are existing residential homes to the west of the project site which are a portion of the Wailuku Heights area. Further south of the property are existing residential areas of Waikapu, including Waiolani Mauka.

The proposed project will be comprised of 202 residential units anticipated for sale at affordable levels per the Area Median Index (AMI). Related improvements to be developed with the project include onsite parking for residents and visitors, internal roadways and sidewalks, bike paths, landscaping, a pavilion, playground, spot parks, drainage improvements, underground utility connections, and two (2) access connections to Kuʻikahi Drive. A roundabout at the intersection of Kuʻikahi Drive and Kehalani Mauka Parkway is proposed. It is noted that Kuʻikahi Drive is a County of Maui roadway.

The project site is not located within the County of Maui, Special Management Area (SMA), is designated "Agricultural" by the State Land Use Commission (LUC), is zoned as "Agricultural" by Maui County, is located within the Maui Island Plan's (MIP), Rural Growth Boundary (RGB), and Urban Growth Boundary (UGB), and is designated "Agriculture" in the Wailuku-Kahului Community Plan. As a 100 percent affordable housing development, the Applicant will apply for Chapter 2.97, Maui County Code approval and request a District Boundary Amendment (DBA) from the Maui County Council.

The use of County lands triggers the preparation of an Environmental Assessment (EA) to comply with the environmental review requirements of Hawai'i Revised Statutes (HRS), Chapter 343. As such, an EA is being prepared to evaluate potential impacts of the proposed project. The County of Maui, Department of Housing and Human Concerns will serve as the approving agency for the EA.

List of Acronyms

AIS Archaeological Inventory Survey

ALISH Agricultural Lands of Importance to the State of Hawai'i

AMI Area Median Income amsl above mean sea level

CO2 EQ

BMPs Best Management Practices
BSM Blackburn's Sphinx Moth
cfs cubic feet per second
CIA Cultural Impact Assessment

DEM Department of Environmental Management
DHHC Department of Housing and Human Concerns
DLNR Department of Land and Natural Resources

Carbon Dioxide Equivalent

DOE Department of Education
DOH Department of Health

DPW Department of Public Works
DWS Department of Water Supply
EA Environmental Assessment

ECA Education Contribution Agreement

FEMA Federal Emergency Management Agency

FIRM Flood Insurance Rate Map

FONSI Finding of No Significant Impact

GHG Greenhouse Gases

GIS Geographical Information Systems

GPD gallons per day

HAR Hawai'i Administrative Rules
HRS Hawai'i Revised Statutes

HUD U.S. Department of Housing and Urban Development

IaA Iao Silty Clay

IAL Important Agricultural Lands

IbB Iao Cobbly Silty Clay

IcB Iao Clay
kWh Kilowatt Hours
MCC Maui County Code
MDG Million Gallons Per Day

MG Million Gallons
Mph Miles per Hour
NOD Notice of Deficiency

NPDES National Pollutant Discharge Elimination System

PER Preliminary Engineering Report

s.f. Square Feet

SDOT State Department of Transportation SHPD State Historic Preservation Division

SLUC State Land Use Commission
SLUD State Land Use Designation
TIAR Traffic Impact Assessment Report
USFWS U.S. Fish and Wildlife Service

WKWWRF Wailuku Kahului Waste Water Reclamation Facility

WWC Wailuku Water Company

WWPS Wailuku Wastewater Pump Station

PROJECT OVERVIEW

I. PROJECT OVERVIEW

A. PROJECT BACKGROUND

Kuikahi Properties, LLC ("Applicant") is proposing a new residential community, to include a variety of residence types such as multi-family, duplex, townhome, live-work, studio, and single-family units on an approximately 14.9-acre portion of land identified as Tax Map Key (2)3-5-002:003 (Parcel 3) in Wailuku, Maui, Hawai'i. See **Figure 1**. The 14.9-acre portion of Parcel 3 is hereafter referred to as "project site". The proposed development also includes a minor commercial component through the live-work units, which are envisioned to be for neighborhood services or office-types of businesses. See **Figure 1** and **Figure 2**. The proposed project site is located mauka of Honoapi'ilani Highway, which borders Parcel 3 to the east, and adjacent to Ku'ikahi Drive, which borders the project site to the north. Vacant agricultural lands are located immediately to the south of the project site with existing residential areas of Waikapu located further south. The existing Wailuku Heights subdivision is located to the west.

The proposed project will be comprised of 202 residential units affordable to families between the 60 percent to 140 percent of the Area Median Income (AMI), and includes a minor commercial component. **Table 1** outlines the number of units per unit type to be provided at the project.

Table 1. Ku'ikahi Affordable Housing Project Units

Unit Type	Number of Units	
Multi-Family/Condominium	120	
Duplex	18	
Townhomes	14	
Live-Work	16	
Studio	28	
Single-Family	6	
TOTAL	202	

In addition to the residences, approximately 456 parking stalls will be provided onsite for residents' and visitors' use. The proposed project also includes a pavilion, playground, pedestrian and bike path, and "spot parks" for residents' use. Related improvements to be developed with the project include internal roadways and sidewalks, landscaping, drainage improvements, and utility connections. See **Figure 3.** Preliminary Site Plan.

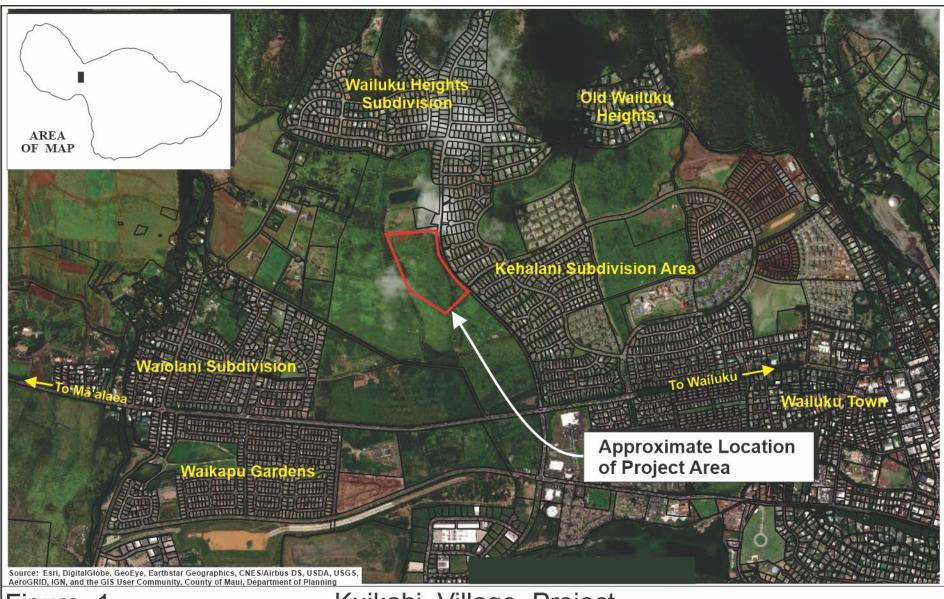


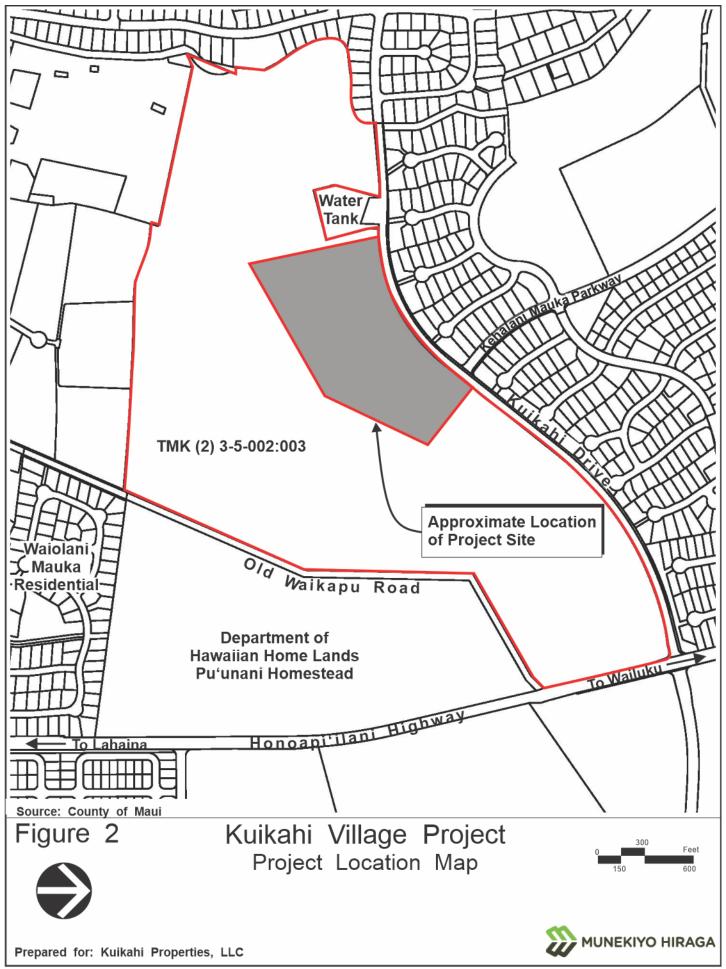
Figure 1



Kuikahi Village Project Regional Location Map









The following is a summary of the residential units and amenities proposed as part of the Kuikahi Village Project. See **Appendix "A"** with preliminary project plans.

Multi-Family/Condominium Units

The project is proposing 120 Multi-Family/Condominium units which will be located in 11 buildings. The multi-family units will include two (2) bedroom, two (2) bathroom units and three (3) bedroom, two (2) bathroom units. The unit sizes will range from approximately 840 square feet (s.f.) to 1,060 s.f. The multi-family buildings will be three (3) stories in height. Associated parking stalls for the units will also be provided. The multi-family units are proposed for the north side of the project site. Refer to **Figure 3**. Preliminary Site Plan.

Duplex Units

Eighteen (18) duplex units are proposed in nine (9) buildings at the project site. The duplex buildings will be one (1) story and two (2) stories in height and units will include three (3) bedroom, two (2) bathroom units. The duplex units will be approximately 900 s.f. Related parking stalls will also be provided in the area of the units. The duplex units are proposed for the center portion of the project site.

Townhomes

Fourteen (14) townhome units are proposed in seven (7) buildings at the project site. The townhomes will be two (2) stories in height, and units will include three (3) bedroom, two (2) bathroom units. The townhomes will be approximately 1,120 s.f. Related parking stalls will be provided in the area for these units.

Live-Work Units

Eight (8) buildings will house a total of 16 live-work type units. The live-work type units are proposed at the eastern end of the project site. The live-work units will be approximately 1,860 s.f. and include three (3) bedroom, two (2) bathroom units. The live-work units will be three (3) stories in height and include parking for the residential and limited commercial use of the buildings. The live-work units are proposed for the eastern portion of the project site.

The 16 live-work units are an attractive living option to address the "missing middle housing", as described in a Housing Technical Resource Paper (County of Maui, 2018) previously prepared for the County of Maui's Planning Department. The intention of these live-work units is to allow residents to supplement their mortgage and living expenses through a multitude of ways, including but not limited to such options like renting out a portion of their unit to long-term residents or conducting a small, home business that is

secondary to the use of the home as a residence. Further, any business-related activities will be in compliance with use regulations as outlined in Chapter 19.67 of the Maui County Code (MCC).

Studio Units

A total of 28 one bedroom, one bathroom units are proposed in 14 buildings. The units will be approximately 370 s.f. in size and will be located in two (2) story buildings. Related parking for the studio units is also provided. The studio units are proposed for the southern area of the project site, located between the single-family residential and live-work units.

Single-Family Residences

Six (6) single-family residences are also proposed, with four (4) bedroom and two (2) bathroom layouts. The homes would be approximately 1,400 s.f. in size and are located on the southwest side of the project site. Property lots for the single-family residences will range in size from approximately 4,600 s.f. to 5,200 s.f.

Recreational Amenities

The project is proposing five (5) spot parks throughout the project site as well as a playground and pavilion, located in the center of the project site. Three (3) spot parks are located within the multi-family residential area, with one (1) spot park located adjacent to the live-work units and the studio and single-family residential units. The pavilion and playground is proposed within the duplex unit area. Additionally, the Applicant is proposing a pedestrian/bike path at the west end of the project site. The pedestrian/bike path will connect with Kuʻikahi Drive. Refer to **Figure 3.** Preliminary Site Plan.

Other Related Improvements

The proposed project will be accessible via two (2) entrances from Kuʻikahi Drive, one at the south portion of the project area, across of Kehalani Mauka Parkway, and the other on the north portion of the project site below an existing water tank. Refer to **Figure 3**. Preliminary Site Plan. In coordination with the County of Maui, Department of Public Works, the Applicant is proposing a roundabout at the southeast project driveway with Kuʻikahi Drive. Further discussion of the proposed roundabout is included in Chapter II of this document.

Additionally, other related infrastructural (i.e., water, sewer, drainage, electrical, cable) improvements will be provided for the project as well as area landscaping, grading and other improvements relative to the overall development of the project. Preliminary development plans for the proposed project are included as **Appendix "A"**.

B. PROJECT NEED

For many years, Maui has experienced a shortage of affordable housing for local residents. There has been very little housing available and affordable to lower income families, forcing many to either live in less than ideal, cramped conditions or relocate offisland. While there are other affordable housing projects being developed in the Wailuku area currently, the proposed project is unique in providing a variety of unit types to accommodate families of different sizes. As previously stated, the proposed project will address this housing shortage by providing 202 residential units of varying size to families earning between 60 and 140 percent of the AMI.

The proposed project would be an infill project as it is generally surrounded by existing residential development to the north, south and west and commercial development to the east. The site is located in proximity to existing infrastructure and services and amenities that support residential housing.

C. REGULATORY CONSIDERATIONS

The project site is designated as "Agricultural" by the State Land Use Commission (SLUC) and is zoned as "Agricultural" by Maui County. Furthermore, the project site is within the Maui Island Plan's Urban and Rural Growth Boundaries and is designated "Agriculture" in the Wailuku-Kahului Community Plan. Due to the project's "Agricultural" State Land Use designation, and that the project area is less than 15 acres, the Applicant will be seeking approval of a District Boundary Amendment from the Maui County Council. As a 100 percent affordable housing development, the Applicant is applying for Chapter 2.97, MCC approval from the Maui County Council for the proposed development.

Though the proposed project will utilize private funds, County lands will be used for improvements to Kuʻikahi Drive. The use of County lands triggers compliance with the environmental review requirements of Hawaiʻi Revised Statutes (HRS), Chapter 343. Accordingly, this Environmental Assessment (EA) is being prepared pursuant to Chapter 343, HRS and Chapter 11-200.1, Hawaiʻi Administrative Rules to evaluate the technical characteristics and potential environmental impacts of the proposed project, as well as to advance findings and mitigative measures relative to the project. The County of Maui, Department of Housing and Human Concerns will serve as the approving agency for the EA as the improvements are tied to the affordable housing project.

D. <u>CONSTRUCTION COST AND TIMELINE</u>

The proposed Kuikahi Village Project is anticipated to take 2.5 to 3 years to obtain all necessary construction-related permitting as well as complete construction. The project construction cost is estimated at \$65 million.

DESCRIPTION OF THE EXISTING CONDITIONS, POTENTIAL IMPACTS AND MITIGATION MEASURES



II. DESCRIPTION OF THE EXISTING CONDITIONS, POTENTIAL IMPACTS AND MITIGATION MEASURES

A. PHYSICAL SETTING

1. Surrounding Land Use

a. **Existing Conditions**

The project site, including infrastructural improvements, is comprised of 14.9 acres and is located in northern Wailuku. The project site is located mauka of Honoapi'ilani Highway, which borders the site to the east, and adjacent to Ku'ikahi Drive, which borders the site to the north. Directly to the west and mauka from the project site is the Wailuku Heights subdivision, while further north and northeast (across Honoapi'ilani Highway) is the Kehalani Project District area. Vacant agricultural lands are located immediately to the south of the project site. Offsite utilities, such as sewer, water, electrical, and communication underground and overhead lines, exist within Ku'ikahi Drive. Various other residential developments and a handful of small locally owned businesses comprise the general land use fabric of this area of Wailuku. Refer to **Figure 1** and **Figure 2**.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project is located adjacent to existing infrastructure and in an appropriate location adjacent to urbanized areas of Wailuku. The proposed project is compatible with the surrounding existing uses of the area. In the context of surrounding land uses, the proposed project is not anticipated to have a significant adverse effect on the surrounding landscape. The proposed project offers multiple housing types for various family sizes, all of which will be affordable for Maui's families.

2. Climate

a. <u>Existing Conditions</u>

Maui's climate is relatively consistent throughout the year. The island's climate varies as the terrain changes. Characteristic of Maui's climate, the proposed project site experiences mild and uniform temperatures year-round, moderate humidity and consistent trade winds.

Average temperatures at the general project area (based on temperatures recorded at Kahului Airport) range from the low 60s to high 80s

(Fahrenheit). September is historically the warmest month, while February is the coolest. Annual precipitation rainfall average was approximately 13 inches (Maui County Data Book, 2019). Winds blow predominantly out of the north-northeasterly direction.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed action will occur in an area formerly used for agricultural cultivation which is now mostly vacant. The proposed project will be located in the midst of other similar residential developments. The proposed project is not anticipated to have an adverse effect on climate.

3. Topography and Soil Conditions

a. **Existing Conditions**

Elevations across the 14.9-acre proposed subdivision site range from approximately 664 feet above mean sea level (amsl) to 540 feet amsl. The existing terrain slopes steadily downward from the northwestern corner of the site to the eastern portion of the site at a slope of approximately 10.6 percent. See **Appendix "B"**, Preliminary Engineering Report.

Underlying the project site and surrounding area are soils belonging to the Pulehu-Ewa-Jaucus association. According to the <u>Soil Survey of the Islands of Kaua'i, O'ahu, Maui, Moloka'i, and Lāna'i, State of Hawai'i, prepared by the United States Department of Agriculture Soil Conservation Service, these soils are characterized as having a slight to moderate erosion hazard (Foote et al, 1972). See **Figure 4**.</u>

Per the "Soil Survey Database for the Island of Maui, Hawai'i", the project area is located on soils identified as, Iao Clay (IcB) and Iao Cobbly Silty Clay (IbB). These soils are reported to produce a low to medium amount of runoff and represent a slight to moderate erosion hazard (U.S. Department of Agriculture, 2014). See **Figure 5**.

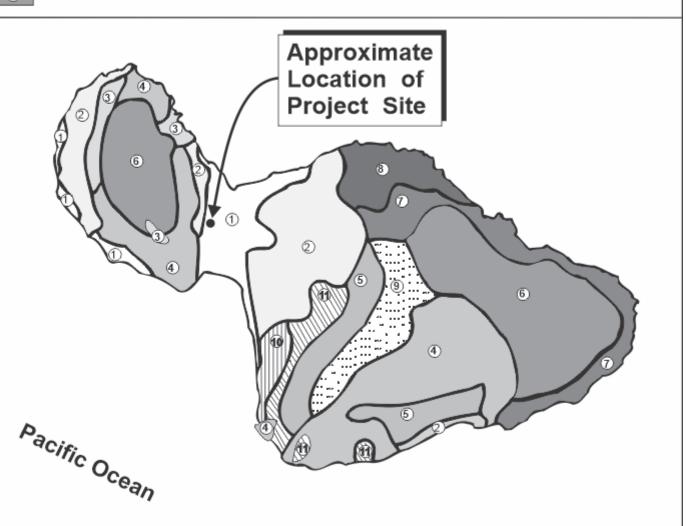
b. <u>Potential Impacts and Mitigation Measures</u>

The 14.9-acre project site was previously used for agriculture, and is currently vacant and undeveloped. The project grading concept considers the balancing of cut and fill quantities to reduce the import and/or export of earthwork material and to ensure that the building height standards can be met. Best Management Practices (BMPs) will be implemented during construction to minimize impacts from soil erosion resulting from wind and water (e.g., dust and silt fencing, watering for dust control, etc.).

LEGEND

- Pulehu-Ewa-Jaucas association
- Waiakoa-Keahua-Molokai association
- (3) Honolua-Olelo association
- (4) Rock land-Rough mountainous land association
- (5) Puu Pa-Kula-Pane association
- Hydrandepts-Tropaquods association

- (7) Hana-Makaalae-Kailua association
- 8 Pauwela-Haiku association
- Laumaia-Kaipoipoi-Olinda association
- Keawakapu-Makena association
- Kamaole-Oanapuka association



Map Source: U.S. Department of Agriculture, Soil Conservation Service, 1972

Figure 4

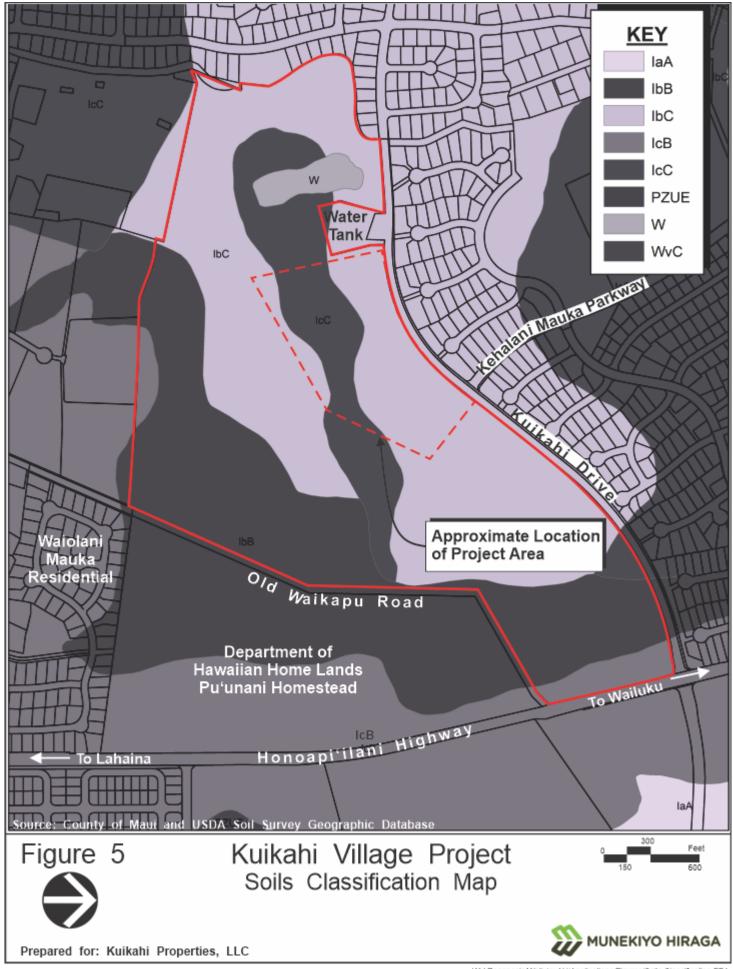
Kuikahi Village Project Soil Association Map

NOT TO SCALE



Prepared for: Kuikahi Properties, LLC





An application for a National Pollutant Discharge Elimination System (NPDES) permit will be submitted to the State Department of Health (DOH) for review and approval prior to the start of construction of the proposed subdivision. Grading and Work on County Highway permits will also be applied for the proposed subdivision and offsite roadway and utility connections. The underlying soils do not pose limitations with respect to project constructability. The proposed project is not anticipated to have an adverse effect on topography and soils. Refer to **Appendix "B"**.

4. <u>Agricultural Productivity Considerations</u>

a. **Existing Conditions**

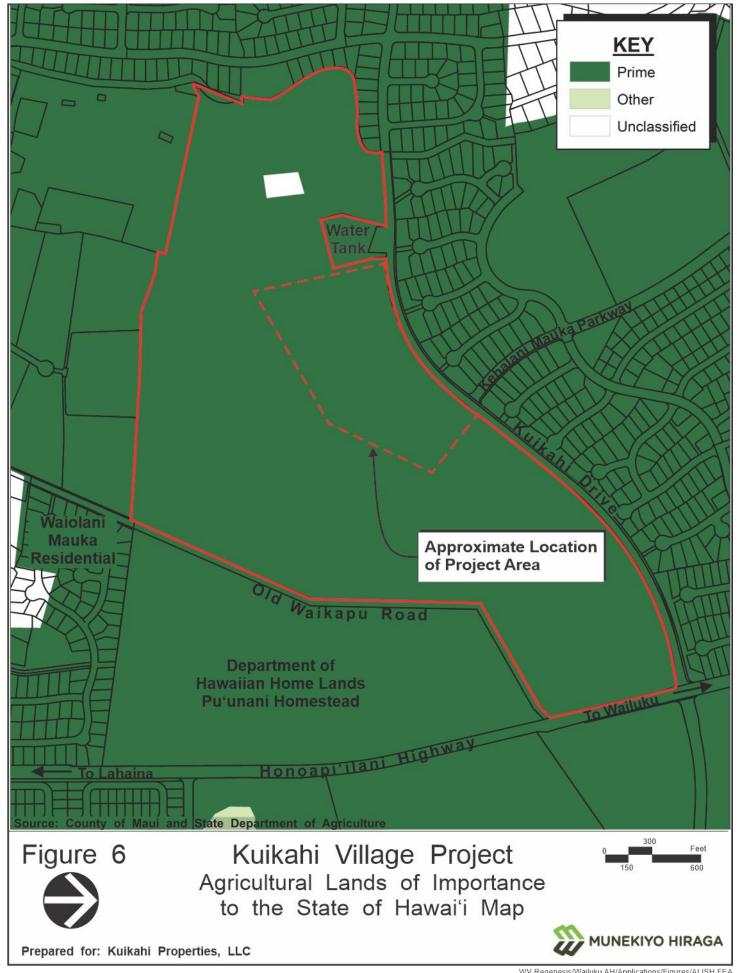
In 1977, the State Department of Agriculture developed a classification system to identify Agricultural Lands of Importance to the State of Hawai'i (ALISH). The classification system is based primarily, but not exclusively, on the soil classification of the land. The three (3) categories are "Prime", "Unique" and "Other Important" agricultural lands, with all remaining lands identified as "Unclassified".

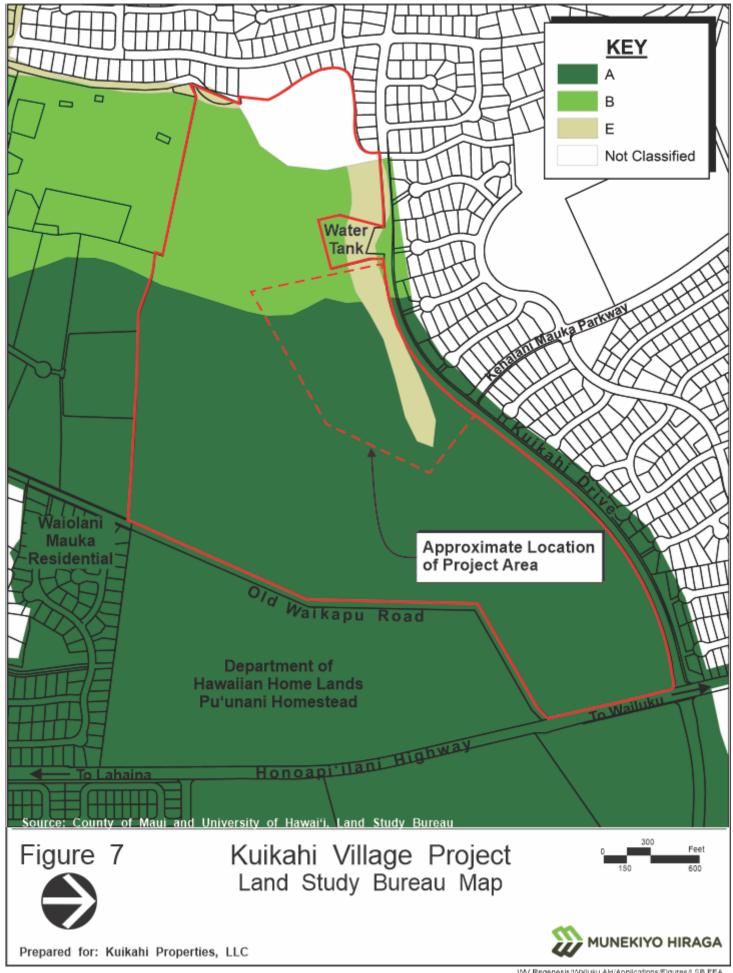
"Prime" agricultural lands have soil quality, growing season, and moisture supply needed to produce sustained high yield crops economically. "Unique" agricultural lands possess a combination of soil quality, growing season, and moisture supply to produce sustained high yields of specific crop. "Other" important agricultural lands are lands that have not been rated "Prime" or "Unique" agricultural lands that are also of statewide or local importance for agricultural use.

As previously stated, the project site is located in an area of Wailuku that was formerly utilized for agricultural purposes for multiple decades. As such, the project site is located within the ALISH's "Prime" land area. See **Figure 6.** Agricultural Lands of Importance to the State of Hawai'i Map. However, the project site has not been cultivated for agricultural use for over 15 years and currently sits vacant and underutilized.

Separately, the University of Hawai'i, Land Study Bureau (LSB) developed the Overall Productivity Rating, which classified soils according to five (5) productivity levels, with "A" representing the class of highest productivity soils and "E" representing the lowest.

The soils in the eastern portion of the project site has been classified "A", while the soils in the western portion has been classified as "B", and the soil along a small strip on the northern portion of the project site classified as "E" by the LSB. See **Figure 7**.





b. <u>Potential Impacts and Mitigation Measures</u>

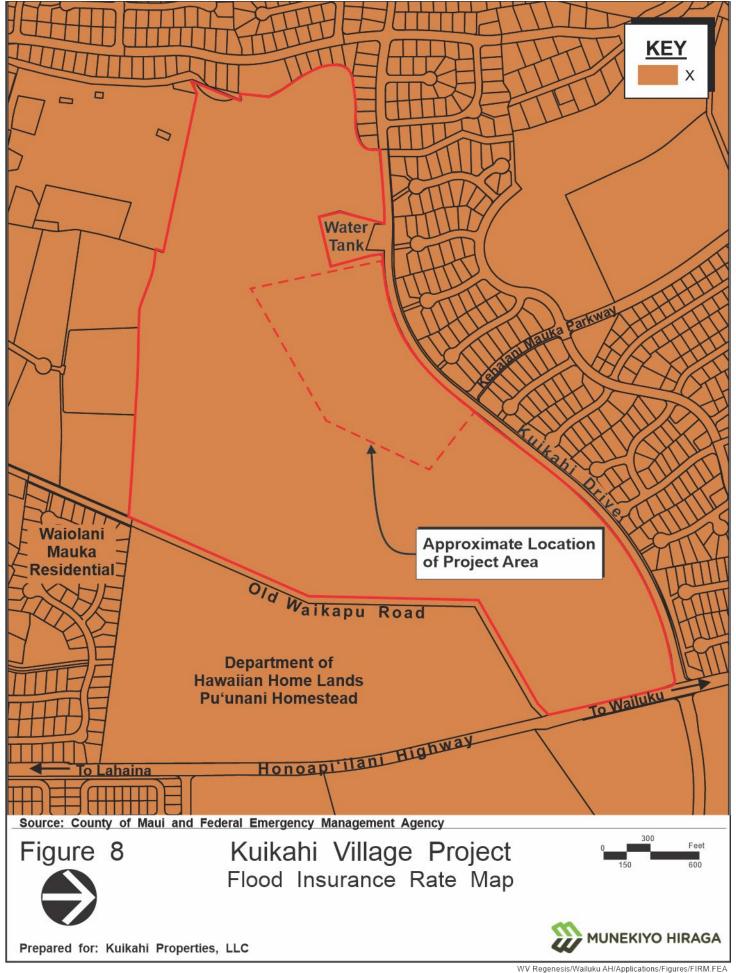
The proposed project will utilize the property for needed affordable housing for Maui families earning 60 percent to 140 percent of the Area Median Income. The proposed project is considered an infill development, as the property is located adjacent to existing urbanized areas with other similar residential subdivisions. The proposed action will occur on property that has been fallow for over 15 years. Additionally, the use of the 14.9 acres for affordable housing purpose represents a relatively small area of land designated for agricultural use on the island of Maui. There are approximately 242,440 acres of land designated "Agricultural" by the SLUC on Maui island alone (Maui County Data Book, 2019). As the lands are not currently actively cultivated, there are no adverse impacts to agriculturally productive lands as a result of the proposed action.

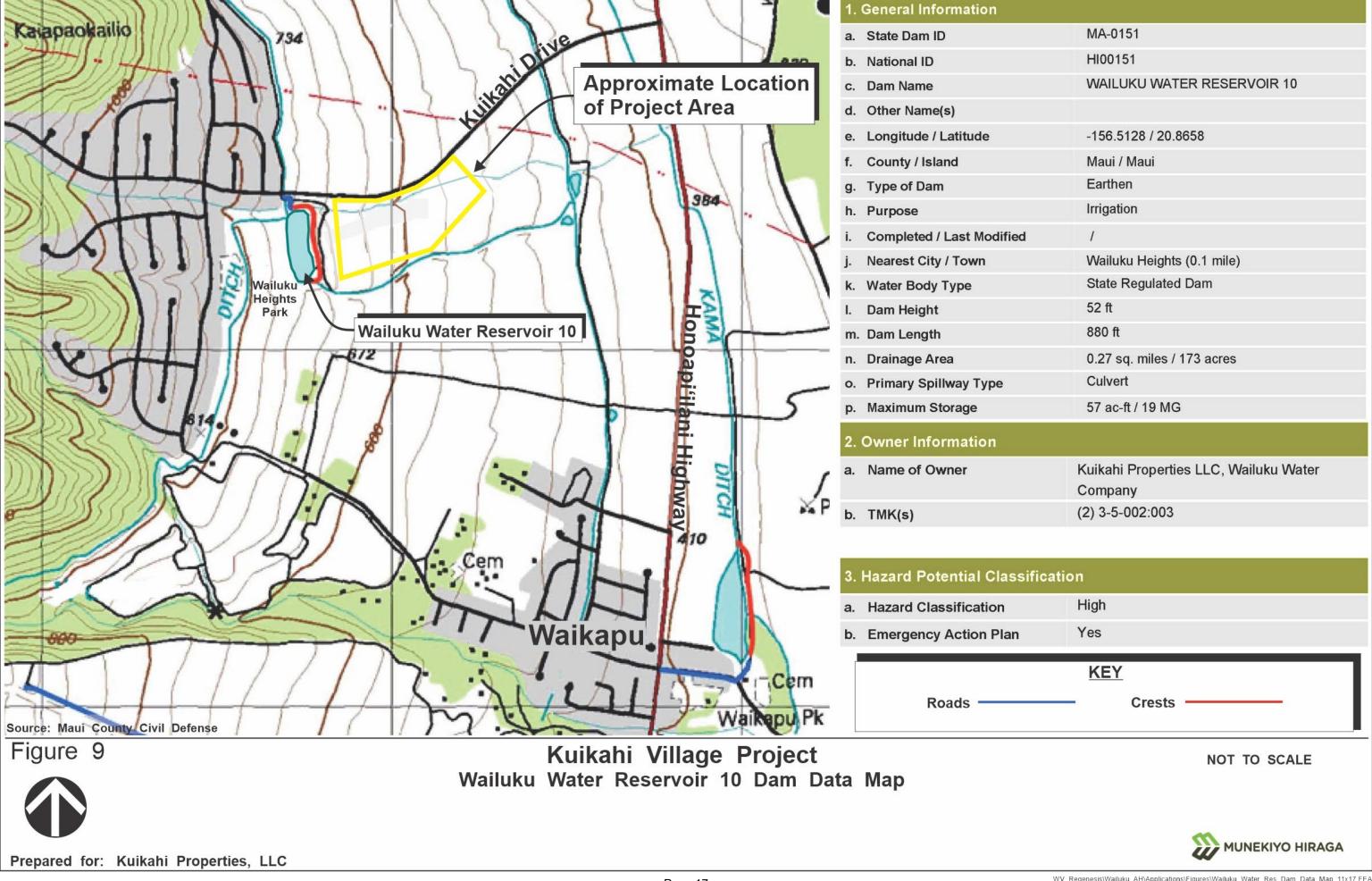
5. Flood, Tsunami, and Sea Level Rise

a. **Existing Conditions**

The Flood Insurance Rate Map (FIRM), Geographic Information System (GIS) layer provided by the United States (U.S.) Federal Emergency Management Agency (FEMA) indicates the project site is situated in Flood Zone X, outside both the floodplain and tsunami zone. Flood Zone X (unshaded) represents areas outside of the 0.2 percent annual chance flood plain and there are no restrictions upon development within this zone. See **Figure 8**.

Mauka of the proposed project site, above the existing water tank lot, is the Wailuku Water Reservoir 10 which is owned by the Applicant Kuikahi Properties, LLC, leased by Wailuku Water Company (WWC) LLC, and is regulated by the State of Hawai'i. See Figure 9 for attributes of the The reservoir is used for irrigation and water supply, and reservoir. accommodates storm drainage from the Wailuku Heights subdivision. Reservoir dimensions were documented back in 2012 to be 52 feet in height by 880 feet in length. Originally constructed for irrigation and water supply in 1951, it was enlarged in 1967 with an additional embankment toward the north and an additional spillway with an invert approximately one (1) foot higher than the original spillway. Storage capacity of the reservoir is approximately 57 acre-feet or 19 Million Gallons (MG). By definition, the reservoir's embankment barrier from the lowest elevation on the outside limit of the barrier exceeds 25 feet in height which meets the threshold for being considered a dam by the State Department of Land and Natural Resources (DLNR).





Inflow enters from 1) the lao-Waikapu Ditch, 2) a corrugated metal pipe at least 48-inches in diameter from a storm drain system, and 3) an 18-inch ductile iron pipe from an unknown source. Inflows reported by DLNR from the lao-Waikapu Ditch is approximately 18 MG per day, and can be controlled at the stream diversion. Inflow from the storm drain and 18-inch pipe are unmeasured and uncontrolled.

An Evacuation Zone Map generated by the Pacific Disaster Center for the DLNR, dated November 27, 2012, illustrates an area below the existing Wailuku Water Reservoir 10 that would experience inundation in the event of a dam failure. See **Figure 10**. The proposed project area is within this mapped inundation area. Otherwise, the project site does not experience any significant local flooding problems due to its location in Waikapū's and Wailuku's gently sloping mauka to makai topography.

A 3.2-foot rise in sea level is projected for the Hawaiian Islands by the mid-to-latter half of the 21st century based on the findings of the Hawaiii Sea Level Rise Vulnerability and Adaptation Report that was prepared in 2017 by the Hawaiii Climate Change Mitigation and Adaptation Commission. (Hawaiii Climate Change Mitigation and Adaptation Commission, 2017). It is noted that the project site is located inland and outside of the projected 3.2-foot sea level rise exposure area.

b. Potential Impacts and Mitigation Measures

The development of the proposed project will comply with County of Maui's drainage standards and will utilize stormwater runoff BMPs during construction. There are no significant adverse impacts to drainage conditions and flooding anticipated as a result of grading activities associated with the construction of the proposed project. The proposed project will also provide drainage improvements to mitigate any increase in runoff created by the project. See Section D.4. Drainage, of this chapter for further discussion. Although the proposed project site is within the dam failure evacuation zone map limits, it is noted that 18 MG per day of inflow from the lao-Waikapu ditch is controllable and there is a primary spillway on the southern portion of the reservoir (right abutment) composed of a 6inch diameter concrete encased corrugated metal pipe set approximately 5 feet below the crest elevation of the reservoir. Refer to Figure 10. Another secondary spillway is an uncontrolled masonry lined channel near the left abutment that flows into a grass-lined drainage swale that eventually joins into the Kaiapaokailio Stream. These spillways provide some provisions for overflows to potentially mitigate a dam failure.



Disclaimer: Information shown on this map is approximate and should be used as a guideline for emergency response. While the best available data has been utilized as inputs into the dam failure computer model, the final modeled product results should be interpreted as "best available estimates" of the evacuation areas. These dam failure computer models assumed that each dam fails from a defect in the embankment structure, while full at maximum capacity, under dry (no rain) conditions and no discharge through the spillways. Dam Breaches during flooding or other hazard events could differ or be larger than the area identified.

Should evacuations be initiated, listen to instructions from your local emergency management / civil defense agency, and directives from the police and fire department. Based on the anticipated dam hazard or multiple hazards facing the community, this evacuation area may be altered by the local emergency management agency. The dam evacuation area is different from FEMA flood zone maps or the Tsunami Evacuation Maps (those can be viewed at: gis.hawaiinfip.org). Although the modeled dam failure area utilized to create the evacuation zone maps were conducted by PDC for the State DLNR, the displayed evacuation map is the product and property of the local County Emergency Management or Civil Defense Agency. Any usage or alteration of this map should be cleared with that respective county agency.

For more information: contact local Emergency Management / Civil Defense Agency or visit: http://dlnreng.hawaii.gov/dam

Source: Maui County Civil Defense Figure 10

Kuikahi Village Project Wailuku Water Reservoir 10 Evacuation Zone Map

overtopping.

NOT TO SCALE



Prepared for: Kuikahi Properties, LLC



The DLNR issued a Wailuku Water Reservoir 10 Maui Dam Safety - Notice of Deficiency (NOD) dated September 4, 2021, to the Applicant and the WWC. The NOD requires compliance with a Remediation Schedule that outlines deadlines for certain actions as follows:

By June 1, 2022: Contract with a qualified consultant to complete an engineering evaluation of the deficiencies.

By June 1, 2023: Submit Technical Studies to document compliance with Hawaii Administrative Rules §13-190.1-4 and the Wailuku Water Reservoir 10 Phase I Dam Safety Inspection Report, dated June 21, 2019.

By December 31, 2023: Submit a Dam Safety Permit application package per HAR §13-190.1-20 to bring the facility in compliance with HAR §13-190.1-4 in accordance with the above mentioned Inspection Report dated June 21, 2019.

The Applicant is monitoring and working closely with its lessee WWC to insure compliance with the NOD action deadlines. WWC is actively in the process of securing a qualified consultant before the first deadline and the Applicant will continue to monitor WWC's progress in meeting the subsequent deadlines.

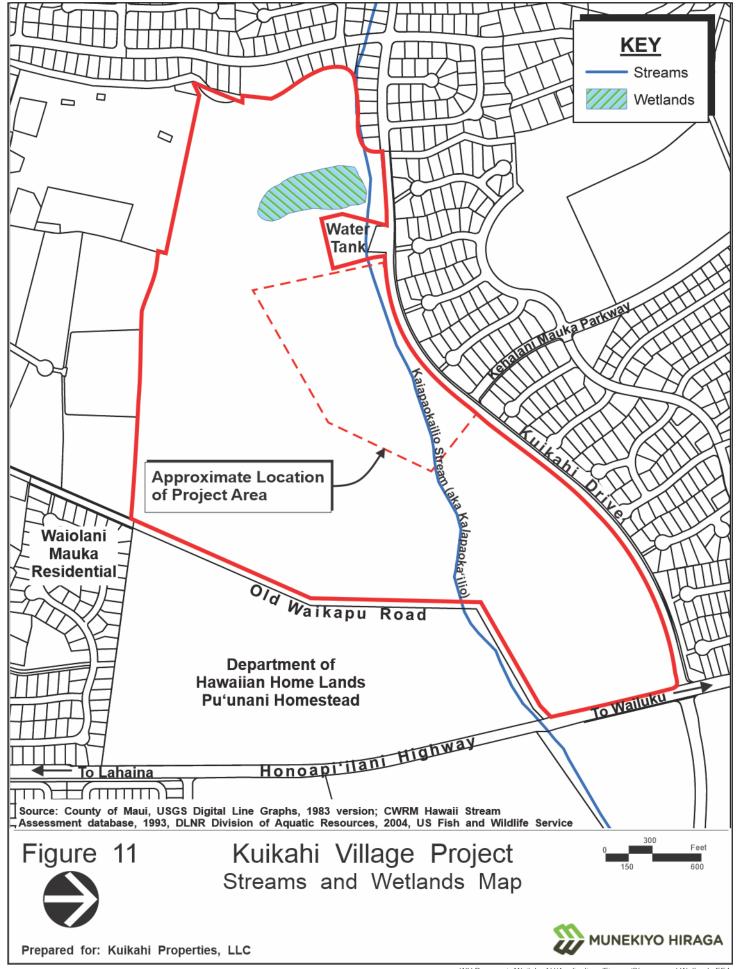
Accordingly, significant adverse impacts associated with floods, tsunamis, and sea level rise are not anticipated.

6. Streams and Wetlands

a. **Existing Conditions**

A natural, typically dry drainageway (gully) that originates in the West Maui Mountains traverses through the northernmost portion of Parcel 2, and also through Parcel 64. See **Figure 11**. It is noted as Kalapaokaʻīlio Stream in US Geological Survey map documents of this area; however, the drainageway is correctly known as Kalapaokaʻīlio Stream (Ulukau, Hawaiian Place Names, 2021) . The drainageway ultimately empties into a dry overflow basin in the Waiʻale Reservoir.

The Waikapū Stream is located approximately 3,000 feet to the south of the project site. Waikapū Stream is a perennial stream which originates in the upper reaches of Waikapū Valley, ultimately discharging into Keālia Pond in the Māʻalaea flats. There are no known wetlands or other water bodies on or in the vicinity of the project site.



b. <u>Potential Impacts and Mitigation Measures</u>

The project site is located in the midst of residential developments in Wailuku. Appropriate BMPs will be used during construction and applicable drainage detention measures provided for the long-term habitation of the site. The Applicant will make every effort to ensure that the project will not have a direct impact upon the natural drainageway, Kaiapaokailio Stream, Waikapū Stream, or any other waterbody in the region.

7. Flora and Fauna

a. **Existing Conditions**

A flora and fauna survey was conducted for the proposed project by Robert W. Hobdy, environmental consultant, in June 2020. See **Appendix "C"**.

The objectives of the survey were to:

- 1. Document what plant and animal species occur on the property or may likely occur in the existing habitat.
- 2. Document the status and abundance of each species.
- 3. Determine the presence or likely occurrence of any native flora and fauna, particularly any that are Federally listed as Threatened or Endangered. If such occur, identify what features of the habitat may be essential for these species.
- 4. Determine if the project area contains any special habitats which if lost or altered might result in a significant negative impact on the flora and fauna in this part of the island.

A walk-through botanical survey was conducted to identify all plant species, distribution, and abundance at the project site. The vegetation in the project area was dominated by tall, dense grass. Plant diversity was low and many species were heavily grazed by goats and deer. A total of 30 plant species were recorded during the survey. One (1) species of Guinea grass was abundant throughout the project area, two (2) other species were common, koa haole, and glycine. The remaining 27 plant species were either uncommon or rare. There were no native plants found during the survey.

In conjunction with the botanical survey, a walk-through fauna survey was also conducted. Additionally, field observations were made with the aid of

binoculars and by listening to vocalizations. An evening visit was made to the area to record crepuscular activities and vocalization and to see if there was any evidence of occurrence of the endemic and endangered Hawaiian hoary bat in the area. Signs of presence of two (2) species of non-native mammals were observed in the project area during two site visits: domestic goats and axis deer. An evening survey using a bat-detecting device was made in the project area to determine any presence of the Hawaiian hoary bat. No bat activity was detected with the use of this device. Other non-native mammals that would likely use this project area, but which were not seen, include rats, mice, and domestic cats.

Bird diversity and total numbers were low in the project area. Only six (6) widespread non-native bird species were observed during the two (2) site visits. One (1) species was uncommon, the zebra dove, while the remaining five (5) species were all of rare occurrence. A few other non-native bird species would likely utilize this habitat occasionally, but this dry, nearly monotypic grassland is not suitable for Hawai'i's native forest birds, sea birds, water birds or nēnē, and none were seen.

Similarly, insect species and total numbers were likewise sparse in the project area. Six (6) non-native insects were recorded during the two site visits. One (1) species was uncommon, the long-tailed blue butterfly. The remaining five (5) insect species were of rare occurrence. No native insects were seen, and no host plans for any rare native insects, including the Blackburn Sphinx Moth (BSM), were seen.

All mammal, bird and insect species recorded in this project area were nonnative species. Heavy grazing and browsing by domestic and wild animals has reduced plant species to only the hardiest and least edible components. This in turn has resulted in low numbers of all other animal species at the project area.

b. Potential Impacts and Mitigation Measures

Though there were no endangered Hawaiian hoary bats recorded during the survey, the Survey noted that these mammals could occasionally pass through the area. Should they be found in the project area, the U.S. Fish and Wildlife Service (USFWS) has guidelines for their protection which will be followed by the Applicant. Similarly, no native bird species were found at the project area during the two (2) site visits. However, there are native seabirds, the endangered Hawaiian petrel and the threatened Newell's shearwater, that may fly over these lowlands on the way to their burrows high in the mountains. These seabirds, and especially the fledglings, are

attracted to bright lights in the evenings and early dawn hours and can become disoriented and crash. They are then vulnerable to injury, vehicle strikes and predators. As recommended in the Survey, the Applicant will shield all significant outdoor lighting downward to minimize disorientation of these protected seabirds. Additionally, the Applicant will avoid the use of barbed wire fencing for the construction site per comments received from USFWS and State Division of Forestry and Wildlife (DOFAW) and will consult with the agencies regarding the need for a vegetation survey relative to the BSM, prior to the start of grading work. The USFWS confirmed that there were no identified critical habitats for identified species located within a 0.75-mile radius of the site. Refer to **Appendix "C"**.

8. Archaeological Resources

a. Existing Conditions

A previous Archaeological Inventory Survey (AIS) was conducted in 2005 for two (2) parcels totaling 215.8 acres (TMK Nos. (2)3-5-002:002 and 003), which included the 14.9-acre project site. The AIS was conducted by Scientific Consultant Services, Inc. (SCS) and was comprised of historic background settlement pattern research, a complete pedestrian survey of the survey area, and subsurface testing via backhoe and reporting. The State Historic Preservation Division (SHPD) accepted the AIS by letter dated November 18, 2005. See **Appendix "D"** and **Appendix "D-1"**, respectively.

The fieldwork involved the execution of a complete pedestrian survey of the subject area, as well as lands beyond for the purpose of site inventory and limited subsurface testing to evaluate the significance of any subsurface deposits. Laboratory work consisted of analysis of any subsurface deposits found and literature research review involved a review of all previous archaeological work conducted in the surrounding area.

During the field inspection, seven (7) historical sites related to the former use of the area for sugar cane cultivation were identified. The sites were determined significant under Criterion "D" as having the potential to yield information important to understanding the history of the region and were determined to be adequately documented by SHPD. Refer to **Appendix** "**D**". The sites included Waihee Ditch (State Site 50-50-04-5197), Waikapū Ditch (State Site 50-50-04-5493), an unnamed lesser ditch (State Site 50-50-04-5726), a larger unnamed reservoir (State Site 50-50-04-5727), a series of 14 sugar canefield erosion-control soil berms (State Site 50-50-04-5728), and Old

Waikapū Road (State Site 50-50-04-5730). Six (6) of the seven (7) sites are located outside of the project area. The series of sugar cane erosion-control soil berms (State Site -5728) is located within the project site. See **Figure 12**. These sites revealed a network of irrigation systems in the form of ditches and a reservoir, erosion-control berms, and a historic dirt road and are part of the turn-of-the century sugar industry in Hawai'i. No burial features or human remains were identified during the pedestrian surveys or subsurface testing.

For the proposed Kuikahi Village project, a HRS 6E submittal form and related documentation was prepared and submitted to the State Historic Preservation Division (SHPD) for review and determination in February 2021. See **Appendix "D-2"**.

b. Potential Impacts and Mitigation Measures

The previous AIS for the 14.9-acre site involved evaluation, documentation, and recordation and when necessary, limited subsurface investigation of recorded sites. Laboratory analysis was also performed, where necessary.

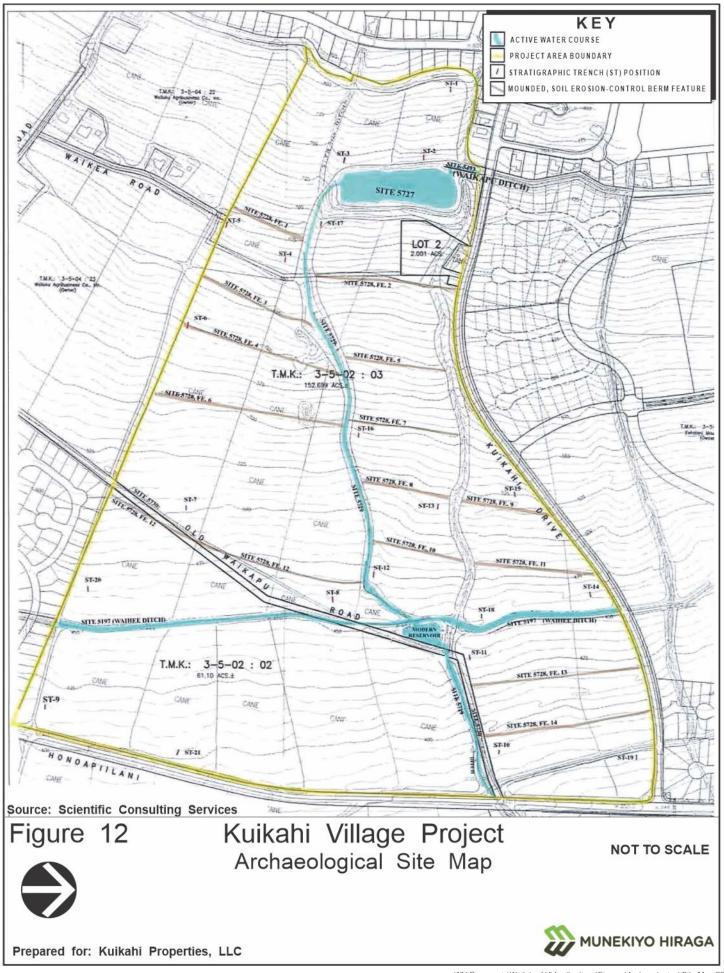
As noted previously, the AIS was accepted by SHPD by letter dated November 18, 2005. In their acceptance letter, SHPD concluded that no further archaeological mitigation is necessary. Refer to **Appendix "D-1"**. The project's archaeologist, SCS, submitted a Section 6E, HRS form to SHPD in February 2021 to reconfirm SHPD's acceptance of the previous AIS and that no further action is necessary. A copy of the Section 6E, HRS form is attached as **Appendix "D-2"**.

9. Cultural Resources

a. <u>Existing Conditions</u>

A Cultural Impact Assessment (CIA) report was prepared March 1, 2021 by Honu Media in order to identify the possibility of ongoing cultural activities and resources within the project area or its vicinity, and then assessing the potential for impacts on these cultural resources. See **Appendix "E"**.

The land on which the proposed project sits was cultivated for sugar and pineapple for over 135 years and untouched since 2005 when agricultural activities ceased. As described in the Archaeological Resources section of this Chapter, the AIS identified historical sites related to former use of the area associated with sugar cane cultivation. No burial features or human remains were identified.



Oral interviews were conducted as part of the CIA with interviewees that responded to solicitations and were contacted for interviews on cultural and historical knowledge of the project area.

An interview was conducted with Warrick Dutro from Kula, Maui who is a member of the Cummings family, but grew up in the area and practices ka nohona Hawai'i. Mr. Dutro farms taro nearby at one of the many lo'i kahiko o Waikapu with walls built from two-man boulders. While the area was commercially farmed, youngsters played, and teenagers came in their trucks to drink beer and socialize. Warrick recalls chicken fights in the pineapple field of Puhiawa'awa, away from Waikapu Valley. The CIA notes that cock fighting was a traditional Hawaiian pastime also, as reported by Martha Beckwith in *Hawaiian Mythology*. Refer to **Appendix "E"**. Other memories described by Mr. Dutro were the pineapple fields being used to dispose of pig bones after family luaus and people sometimes buried their pets in the fields.

Also interviewed was Avery Chumbley, Manager of the Wailuku Water Company, who had knowledge on the history of the area. He spoke of pre-Mahele times in the mid 1800's when the lands were heavily populated with native Hawaiians, particularly in the Wailuku area. During that time, it was Kingdom-land that cultivated coffee beans. Wailuku Sugar Company bought the land in 1894 and its successive entities, Wailuku Agribusiness which was part of C. Brewer & Co., who owned or controlled the property before selling it to Towne Realty. The property was in sugar cane cultivation until it was used for pineapple cultivation from about 1988 until about 2003 or 2004. He had no knowledge on cultural or historical aspects of the property except for the reservoir that is regulated by the DLNR Dam Safety Division. He stated that the regulated dam could be a high risk to life and property. A failure or breach of the dam would be a catastrophic event of severe flooding. Mr. Chumbley was aware of the SCS Archaeology report of 2005 and knew that there were no finds other than plantation irrigation ditches and the Old Waikapu Road.

Seven (7) other people who responded to the solicitation for interviewees were as follows:

- Kumu Hōkūao Pellegrino, President of Na Wai 'Eha, former president of Maui Historical Society, and an educator at Kamehameha Schools. His response is pending.
- Kaniloa Kamaunu, committee member of Aha Moku 'O Wailuku, asked the Applicant for a presentation to 'Aha Moku Committee members and Po'o o ka Moku o Wailuku, Clyde Kahalehau. The presentation is currently being scheduled.

- Kaleo'uhane Ho'opai, Wailuku resident and family genealogist was met during a "talk story" session at Church of God on Ho'okele Street in Wailuku. She did not have any specific cultural or historical facts about the project area.
- Lucienne DeNaie is the Principal of Maui Tomorrow, Sierra Club, and Maui Cultural Land Trust, and a Historian and Author. Her suggestion was to interview Avery Chumbley, Wailuku Water Company, formerly with C. Brewer & Company, which owned Wailuku Sugar Company. She also kindly passed on requests for informants to committee members of the Aha Moku 'O Wailuku.
- Penelope Randall who emailed a reply stating "All I know is that all that area has burials" did not respond to a follow-up email or phone calls. No further response was received by Ms. Randall.
- Amy Halas replied to the first public release, but did not have any specific ties to or information about the project area. No further response was received on a second request.
- Mavis Madieros Oliviera of the Oliviera-Ho'opi'i family of Hana is a Researcher for the Ke 'Au Ali'i land conservation group in Hana. She had no specific information about the project area.

b. Potential Impacts and Mitigation Measures

The CIA report was an effort of multiple online searches of government and museum map collections, photos and aerials that revealed no structures on the property. Refer to **Appendix "E"**. The 2005 AIS of the property recorded historic irrigation ditches, watercourses and roads registered with SHPD. Recent studies of Kehalani Mauka just east and south of the project area also found similar irrigation ditches and no burial assets. Out of the interviews conducted via solicitation, none testified to the presence of any ceremonial or cultural practices, resources, or sites, presence of house sites or burials connected to the project area. As such, the CIA report concluded that there would be no impacts to cultural resources, nor effect on historic properties. Furthermore, the report also recommended adhering to monitoring practices as prescribed by SHPD.

10. Air Quality

a. Existing Conditions

There are no point sources of airborne emissions in the immediate vicinity of the project site. Although minimal, airborne pollutants are largely attributable to vehicular traffic on the surrounding roadways. Windblown dust from surrounding fallow agricultural lands is another source of indirect emissions in the region. These sources, however, are intermittent and

prevailing winds quickly disperse the particulates generated by these temporary sources. Overall, the air quality in the region is considered good.

b. Potential Impacts and Mitigation Measures

In the short term, construction-related activities for the proposed project will be the primary source of airborne pollutants affecting the surrounding area. Site work involving clearing, grubbing, and grading operations will generate fugitive dust. Appropriate BMPs, such as periodic watering of exposed surfaces, installation of dust screens, and regular maintenance of construction equipment will be utilized to minimize air quality impacts associated with project construction.

The proposed project is not an action which will generate adverse long-term air quality impacts. In the long term, the proposed project will provide 204 affordable housing units to families earning 140 percent or below the Area Median Income. The proposed residences are not anticipated to have an adverse effect upon air quality.

11. <u>Greenhouse Gas Considerations</u>

a. <u>Existing Conditions</u>

Greenhouse gases (GHG) (carbon dioxide, methane, nitrous oxide, and fluorinated gases) trap heat in the earth's atmosphere. In the context of climate and ocean warming, increases in levels of atmospheric GHG have been attributed to human activity (IPCC, 2007). Within the State of Hawai'i, the energy sector, including fossil fuel burning to produce electricity, transportation, waste incineration, and natural gas systems, is identified as the source of 89.7 percent of GHG emissions (Hawai'i Department of Health, 2019). Other sources of GHG emissions include industrial facilities, agriculture and forestry, and waste treatment, such as landfills, composting, and wastewater treatment.

The Federal Greenhouse Gas Reporting Program (40 CFR Part 98) requires mandatory reporting of GHG emissions from sources that emit 25,000 metric tons or more of carbon dioxide equivalent (CO2 EQ) per year in the United States. Categories of use which are generally associated with this level of reporting include power plants, petroleum and natural gas systems, refineries, and other heavy manufacturing processes. On Maui, the facilities operating at or above the 25,000 metric ton level include Maui Electric Company's Kahului Power Plant, Ma'alaea Power Plant, and the Central Maui Landfill (U.S. EPA, 2017).

b. <u>Potential Impacts and Mitigating Measures</u>

The proposed action involves the construction of 202 residential units. In the context of the GHG Reporting Program (25,000 metric tons of $CO_2 EQ$), the relative effects of GHG emissions ($CO_2 EQ$) from the project are not considered significant.

The average energy use per household in Maui County¹ is 581 kilowatt hours (kWh) per month (Hawai'i Energy, 2017). This corresponds roughly to production of 4.9 metric tons CO₂ EQ per year (U.S. EPA, 2018). As such, the GHG emissions associated with the proposed development of 204 residences is anticipated to be on the order of 980 metric tons CO₂ EQ per year.

The proposed action will involve short-term consumption of fuel for construction equipment, vehicles, and machinery during the construction period. This usage is not anticipated to be substantial or excessive within the context of the action's benefits over the lifetime of the project. After the project is completed, use of the proposed residences may result in increased motor vehicle traffic in the project area. Statewide, vehicle-related fuel consumption for commercial, industrial, and residential sectors is a less significant contributor to total GHG emissions than emissions attributable to electricity consumption (Hawai'i Department of Health, 2019), and this contribution is anticipated to continue to decrease due to ongoing reduction in vehicle emission standards as well as increased utilization of hybrid and electric vehicles.

The proposed action will incorporate energy efficient features to the extent possible. Features may include solar hot water heaters or other energy efficient hot water devices, energy efficient light fixtures in the parking areas, and use of architectural features on the residential units. Furthermore, the State of Hawai'i has set a renewable energy portfolio standard of 100 percent (100%) by the year 2045 (Section 269-92, HRS) to minimize dependence on fossil fuel combustion, and has declared a policy to reduce GHG emissions to 1990 levels by the year 2020 (Act 234, Session Laws of Hawai'i, 2007). The State is on track to meet these goals (Hawai'i Department of Health, 2019; Hawai'i PUC, 2018), which will result

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¹ Honolulu = 561 kWh/month; Hawai'i = 505 kWh/month. These are county-wide averages. If the proposed residences incorporate solar photovoltaic energy generation or other sustainable elements which would reduce energy consumption below average levels, this can be addressed as a mitigating factor.

in a reduction of GHG impact of the proposed action along with reductions of GHG emissions statewide.

The proposed action is not anticipated to create significant direct and indirect foreseeable GHG emissions. This action does not fall within the threshold of mandatory GHG reporting.

12. Noise Quality

a. **Existing Conditions**

There are no fixed noise generators in the vicinity of the project site. Noise generated in the area is primarily attributed to vehicular traffic along the surrounding roadways, including Honoapi'ilani Highway which lies directly to the east of Parcel 3, where the proposed project will be located. Overall, the noise level in the region is fairly low.

a. <u>Potential Impacts and Mitigation Measures</u>

Ambient noise conditions may be temporarily affected by construction activities. Heavy construction machinery, such as backhoes, dump trucks, front-end loaders, and material-transport vehicles are anticipated to be the dominant noise-generating sources during the construction period of the proposed project.

In order to mitigate noise impacts, construction activities are anticipated to be limited to daylight work hours generally, Monday through Friday. Project-related noise will be minimized through use of applicable BMPs, such as regular maintenance of construction equipment and use of properly muffled equipment. In the long term, the proposed project is not anticipated to have adverse noise quality impacts.

13. <u>Hazardous Materials</u>

a. <u>Existing Conditions</u>

As previously mentioned, the proposed project site had been previously cultivated for sugar cane and pineapple agricultural production for several decades. During this time, agricultural pest control chemicals and fertilizers were used on the property. By the early 2000's, agricultural production of sugar cane and pineapple ceased, and the land has remained vacant and fallow since then.

A Phase 1 Environmental Site Assessment (ESA) had previously been conducted for a master planned residential project that was previously

proposed on Parcel 3 (including the proposed project site), and adjacent properties to Parcel 3, called the Pu'unani project. The Phase 1 ESA identified physical, recognizable environmental conditions as defined by the American Society of Testing Materials (ASTM) standards associated with the past use of the project area. The inspection revealed no evidence of recognized adverse environmental conditions in connection with the prior Pu'unani project properties, as follows:

- Database Listings: The subject site is not listed. The report opined that one (1) nearby listed site and another site located within a half-a-mile do not have a reasonable potential to adversely impact the environmental condition of the subject property due to its down gradient location from the properties.
- Current and Historic Use or Storage of Hazardous and Regulated Substance: There is no evidence of any historic misuse or significant spills of hazardous or regulated substances on the subject properties.
- Solid Waste Management: A limited amount of historical dumping (construction and miscellaneous debris) was evident on the subject properties. Management of these wastes should be performed in a manner that complies with all local, state and federal regulations, as applicable to the waste type. During future site work, if large amounts of construction debris or unidentifiable substances (containers) are discovered, proper waste identification, testing, and applicable waste handling and disposal procedures are recommended.
- Surface Waters and Area Aquifer Protection: The developer and property owner should be aware of the potential for offsite contaminants to migrate into nearby drainageways. Products of concern relating to any future development project or land-clearing activity would be earthen material (silt), paints, oils, antifreezes, and other fluids from automobile or onsite machinery, or leaks from onsite stocked items (Vuich Environmental Consultants, Inc., 2004).

b. Potential Impacts and Proposed Mitigation Measures

Based on the results of the Phase 1 ESA prepared for the previously proposed Pu'unani project which encompassed Parcel 3, including the same project area as the Kuikahi Village Project, there was no evidence of hazardous materials at the project area (Vuich Environmental Consultants, Inc., 2004). Up until about the early 2000's, the area was used for sugar

cane and pineapple cultivation. During future site work, if large amounts of construction debris or unidentifiable substances (i.e., containers) are discovered, proper waste identification, testing, and applicable waste handling and disposal procedures will be implemented.

Use of fertilizers within residential lots and within common areas will be in a manner consistent with best landscape practices so as to avoid the overuse of soil amendments and nutrients. With such practices, there are no anticipated adverse effects on groundwater resources attributed to fertilizer use. No adverse impacts to surface, underground, or marine resources are anticipated.

14. Scenic and Open Space Resources

a. **Existing Conditions**

The West Maui Mountains to the west, Haleakalā to the east and Kahului Bay and the Pacific Ocean to the northeast define the scenic resources in Central Maui.

The project site is surrounded by fallow former agricultural lands and residential developments similar in scale to the proposed project as well as limited commercial development.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed dwelling designs are consistent with other similar developments in the vicinity of the proposed project and will conform to the Maui County Zoning Code for single-family and multi-family structures. The Applicant also prepared a view analysis of the proposed Kuikahi Village from the Ku'ikahi Drive view points. The analysis incorporates the existing structures located to the north of the project site. See Appendix "A-1". Two (2) building types, the Live/Work units and the Multi-Family units, are planned to be three story structures. The remaining unit types will be two stories or less. The Applicant is proposing to construct the Live/Work and Multi-Family units set within the grade to minimize the impact of the structures. The anticipated height of the Live/Work and Multi-Family units is approximately 36 feet. It is noted that electrical utility lines will be placed underground. In addition, the proposed project is located in the upper portion of Parcel 3, away from the Honoapi'ilani Highway, providing an open space setback from the roadway to the house lots. It is anticipated that the project will not have an adverse impact on scenic and open space resources.

B. SOCIO-ECONOMIC ENVIRONMENT

1. <u>Land Use and Community Character</u>

a. **Existing Conditions**

From a regional perspective the project site is located immediately south of the urbanized area of Wailuku Town and north of Waikapū Town. Wailuku Town serves as the commercial and governmental center of the region. The project site is surrounded by fallow former agricultural lands, and other residential developments of the same nature as the proposed project as well as existing commercial development.

b. <u>Potential Impacts and Proposed Mitigation Measures</u>

The project is compatible with the adjacent residential uses and community character. As such, the proposed project is in consonance with the current land use and community character of the area.

2. **Population**

a. <u>Existing Conditions</u>

According to the 2020 U.S. Census, the population of Maui County was 164,754, an increase of 6.4 percent since 2010, when the County had a population of 154,834 (U.S. Census Bureau, 2020). It is noted, however, that population growth over the past decade has been uneven, with stronger growth in the early part of the decade. The U.S. Census Bureau's annual population estimates data indicates that Maui County population grew steadily between 2010 and 2014, when annual population growth rates ranged from 1.2 percent to 1.3 percent. The estimated population in 2014 was 163,036. The 2020 U.S. Census resident count for Maui County is actually lower than the Census Bureau's previous population estimates for 2016 to 2019 (U.S. Census Bureau, 2019).

Sub-county population data from the 2020 Census is not yet available. However, according to the U.S. Census Bureau's 2019 American Community Survey five-year population estimates, the Wailuku Census Designated Place had a population of 17,708 residents between 2014 and 2019 (U.S. Census Bureau, 2019).

The State of Hawai'i, Department of Business Economic Development and Tourism (DBEDT) publishes population projections through 2045. According to the latest forecast, which was published in 2018, Maui

County's population is expected to grow to 211,500 by 2045 (State of Hawai'i, DBEDT, 2018).

b. <u>Potential Impacts and Proposed Mitigation Measures</u>

The proposed project involves developing needed affordable housing units for Maui families earning between 60 percent and up to 140 percent of the AMI. In the context of the County of Maui's population projections through the year 2030, the proposed project is not anticipated to significantly alter population trends. The proposed project is not anticipated to result in adverse impacts on the region's or island's population parameters.

3. Economy

a. Existing Conditions

The economy of Maui is heavily dependent upon the visitor industry. Many of the hotel and resort amenities are in South Maui and West Maui, with non-resort, smaller hotels located in Central Maui.

The economy of the Wailuku region is anchored by government services, with County and State agency offices occupying the civic center portion of town, near the High Street-Main Street intersection. With access to government offices, professional services such as engineering, architectural, and accounting offices are located nearby.

Hawai'i's economy through 2019 was strong, with record-setting visitor arrivals and low unemployment. However, the COVID-19 pandemic has had far reaching impacts on the economy on Maui, in Hawai'i, and across the nation and world. Stay-at-home regulations and travel quarantines aimed to curb the spread of COVID-19 virus in Hawai'i have caused many businesses to shut down or drastically reduce operations. Unemployment claims have soared. The County's and State's economy is slowly recovering, but unemployment remains high. In February 2022, the unemployment rate in Maui County was 4.8 percent, compared to 9.0 percent in February 2021 (Department of Labor and Industrial Relations, 2022).

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project will provide short-term construction-related employment and services. From a long-term perspective, the project will provide much-needed affordable housing in close proximity to the Wailuku Town area. The proposed housing will serve households seeking primary

residence and will not be for second home or transient populations. Affordable housing reduces the portion of incomes residents must pay for rent, providing them with more disposable income. Significant adverse economic impacts are not anticipated.

4. Housing

a. **Existing Conditions**

The County of Maui 2030 General Plan – Countywide Policy Plan notes that "shelter is among the most basic of human needs". The affordability, quality, and location of housing – including the degree of crowding within the home and within the neighborhood – play an enormous role in the quality of life of Maui County's residents.

According to the *Hawaii Housing Planning Study, 2016*, a significant number of Maui households live in overcrowded conditions or are "doubled-up" with other families. According to the report, crowding continues to be a problem in the housing market and in 2016 affected 21.4 percent of households in Maui County.

The population growth factors related to housing demand include total population, households, and household size. The study reported that between 2010 and 2015, the total population increased by 19.3 percent, number of households by 12.5 percent and average household size by 5.8 percent. The data is consistent with a housing market where demand is greater than supply.

According to the study, renters in Maui County represented 39 percent of households and paid the second highest amount (\$2,106) to cover their monthly housing expenses. In 2014, affordable units were most limited in Maui County, with just 48.6 percent of the island's 50,021 units affordable to Maui's lower income households (SMS, 2016).

b. <u>Potential Impacts and Mitigation Measures</u>

As previously mentioned, Maui County's need for affordable homes has risen due to an increasing population over the past decade. According to the *Hawaii Housing Planning Study 2016*, the future housing demand for Maui County between 2015 and 2025 is forecasted to be 13,949 units. The total forecasted (2015-2025) single-family and multi-family units by U.S. Department of Housing and Urban Development (HUD) income classification (Percent of Area Median Income (AMI)) for Maui County for owner occupied and rental units are summarized in **Table 2**.

Table 2. Rental Housing Forecast by HUD Income Classification (Percent of AMI)

	Less than 30 Percent	30-50 Percent	50-60 Percent	60-80 Percent	80-120 Percent	120-140 Percent	140-180 Percent	180+ Percent	Total
Total Demand	2,947	2,775	1,414	2,393	1,626	1,493	500	801	13,949
Total Ownership Units	1,079	824	351	1,151	1,308	1,292	469	766	7,240
Single- Family Ownership	1,022	783	234	1,022	1,112	1,032	368	610	6,183
Multi- Family Ownership	57	41	117	129	196	260	101	156	1,057
Total Rental Units	1,868	1,951	1,063	1,242	318	201	31	35	6,709
Single Family Rental	1,295	1,226	771	1,050	239	156	17	30	4,784
Multi- Family Rental	573	725	292	192	79	45	14	6	1,926
Source: SMS R	Source: SMS Research & Marketing Service, Inc., Hawaii Housing Planning Study, 2016.								

The amount of affordable, long-term housing options, in addition to transportation costs, greatly outpace living wages that families are earning.

The Applicant has reviewed the potential market for the proposed affordable units and analyzed options for the sale of the units. With 100 percent of the proposed units being for sale within the 60 percent to 140 percent AMI, the Applicant will review options to keep these units at affordable sale prices, while providing owners the option to build equity in their units which would allow for the potential to move in to larger or different types of housing units, as their family needs change over time. See **Appendix "F"**, Market Overview, prepared by Applicant.

The proposed project will provide 202 affordable housing units to families earning between 60 percent and up to 140 percent of the AMI, filling a critical need for affordable housing in Maui County. The proposed project is located in close proximity to jobs, schools, and other public and commercial services.

C. PUBLIC SERVICES

1. Solid Waste Collection and Disposal

a. **Existing Conditions**

Single-family residential solid waste collection service in Wailuku is provided by the County of Maui on a weekly basis. Residential solid waste collected by County crews are disposed of at the County's Central Maui Landfill located 4.0 miles southeast of the Kahului Airport. In addition to County-collected refuse, the Central Maui Landfill accepts commercial waste from private collection companies. A privately operated greenwaste recycling facility, Maui Earth Compost Company, is situated at Pulehu Road and Hansen Road, while Eko Compost is operated at the Central Maui Landfill. According to the County of Maui, the Central Maui Landfill has adequate capacity to accommodate residential and commercial waste needs through the year 2026. The County's Department of Environmental Management is currently planning to implement a processing facilities project adjacent to the landfill, which would further extend the projected capacity by an estimated 16 years. The remaining capacity estimate is based on future disposal volumes that assume significant population growth.

b. <u>Potential Impacts and Mitigation Measures</u>

Construction-related waste will be properly disposed of in accordance with policy and practices established by the Solid Waste Division to ensure that there are no adverse impacts to the County's Central Maui Landfill.

Upon completion, it is anticipated that the residences will be served by a private refuse collection service. Refuse from the project site will be disposed of at the County's Central Maui Landfill. As such, there are no adverse impacts anticipated to the County's disposal capacities attributed to the proposed project.

2. Police, Fire, and Medical Facilities

a. <u>Existing Conditions</u>

Police protection for the Wailuku-Kahului region is provided by the Maui Police Department located at the Wailuku Station headquartered on Mahalani Street, approximately two (2) miles northeast of the project site. The Maui Police Department provides investigative services, uniform patrol

services, technical support, and traffic services as stated in its mission to protect the residents of Maui County.

Fire prevention, protection, rescue, and emergency services for the Wailuku-Kahului region are provided by the Maui County Department of Fire and Public Safety. The department has two (2) stations to service the Wailuku-Kahului region, both in proximity to the project site. The Wailuku station is located in Wailuku town approximately 1.5 miles northeast of the project site and the Kahului station is located on Dairy Road in Kahului approximately three (3) miles southeast of the project site.

Maui Memorial Medical Center is managed by Kaiser Permanente and is the only major medical facility on the island. Acute, general, and emergency care services are provided by the 214-bed Maui Memorial Medical Center facility located on Mahalani Street, Wailuku, about two (2) miles east of the project site.

In addition, Kaiser, Maui Medical Group, and Maui Medical Clinic provide health care for the island of Maui. These facilities are located in Wailuku and Kahului. Dental and other medical offices are also located within the Wailuku-Kahului region to serve its residents and visitors.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project involves the proposed development of a new residential development in Wailuku. The proposed project is located within service areas for existing police, fire, and medical facilities and is not anticipated to adversely impact these services.

3. <u>Educational Facilities</u>

a. Existing Conditions

The State Department of Education (DOE) operates several schools in the Wailuku-Kahului region. Public school facilities within the Wailuku-Kahului District area include: two (2) high schools, Henry Perrine Baldwin High and Maui High (grades 9 to 12); two (2) intermediate schools, lao Intermediate and Maui Waena Intermediate School (grades 6 to 8); and six (6) elementary schools (Grades K to 5), Wailuku Elementary, Waihe'e Elementary, Pōmaika'i Elementary, Kahului Elementary, Lihikai Elementary, and Pu'u Kukui Elementary School.

The area is also served by several privately operated schools providing education for elementary, intermediate, and high school students. Privately

operated schools serving the Wailuku-Kahului region include St. Anthony School (grades K to 12), Kaʻahumanu Hou Christian School (grades K to 12), Emmanuel Lutheran School (K to 6), and Maui Adventist School (grades 1 to 8).

The DOE's 2020 to 2021 school enrollment for their Central Maui schools are presented in **Table 3**.

Table 3. 2020 to 2021 DOE School Enrollment

School	Enrollment				
Baldwin High School	1,299				
lao Intermediate School	889				
Kahului Elementary School	901				
Lihikai Elementary School	816				
Maui High School	2,100				
Maui Waena Intermediate School	1,100				
Pōmaikai Elementary School	565				
Pu'u Kukui Elementary School	735				
Waihe'e Elementary School	601				
Wailuku Elementary School	626				
Source: Department of Education, 2020.					

Additionally, the University of Hawai'i Maui College is a four-year college located on Ka'ahumanu Avenue in Kahului.

b. Potential Impacts and Mitigation Measures

The proposed project entails the development of 202 affordable housing units in Wailuku. It is understood that the DOE's elementary, intermediate, and high schools servicing the project area are over capacity. The Applicant will collaborate with the DOE on redistricting strategies and assisting in advancing plans to develop new schools and expanding existing schools for previous proposed large developments in the region.

The proposed project is located in the DOE's Central Maui Impact Fee District. The State law on school impact fees, Chapter 302-A, Hawai'i Revised Statutes (HRS), requires the execution of an Education Contribution Agreement (ECA) with the DOE prior to any approvals of subdivision or building permits. As such, the Applicant is prepared to pay for prescribed impact fees and plans to meet with the DOE to discuss execution of an ECA. Impacts on school facilities will be mitigated with payment of the impact fees.

4. Recreational Facilities

a. Existing Conditions

Within the Wailuku-Kahului Community Plan Region, there are many recreational activities, including shoreline and boating activities at the Kahului Harbor and adjoining beach parks, and organized recreational activities provided/offered at County Parks. Within close proximity of the project site is Waikapū Park and Community Center. In Wailuku town are Wells Park, the Wailuku Elementary School Park, the 'Īao Valley State Park the Kehalani Mauka Park, the Velma McWayne Santos Community Center, Papohaku Park, War Memorial Athletic complex, Wailuku Little League baseball fields, the 65-acre Maui Regional Park, Maui Lani Parkway Park, Sakamoto Swimming Pool, and Keōpūolani Regional Park.

In addition, there are several golf courses in the Wailuku-Kahului region. These include the Kahili and Kamehameha Golf Courses, The Dunes at Maui Lani Golf Course, and the Maui County-owned Waiehu Golf Course.

b. <u>Potential Impacts and Mitigation Measures</u>

The proposed project entails the development of a new affordable housing development in Wailuku. The proposed development will not only include residences, but also a playground, pavilion and "spot parks" for residents' use. The "spot parks" will be approximately 700 to 1,500 s.f. in size, while the pavilion will be approximately 400 s.f. and the playground will be 3,800 s.f. Additionally, a pedestrian and bike path is proposed within the development, which would connect to Ku'ikahi Drive. Refer to **Figure 3.** Preliminary Site Plan. It is anticipated that many residents would relocate from other areas on Maui. As such, adverse impacts to recreational resources are not anticipated.

It is noted that residential subdivisions in the County of Maui are required to dedicate land for park/playground purposes, improvements to a park in the same community plan area, or payment of an in lieu fee to the County. The proposed project is intending to request that the proposed recreational improvements meet the park assessment requirements through the MCC Chapter 2.97 application process.

D. INFRASTRUCTURE

1. Roadways

a. <u>Existing Conditions</u>

A Traffic Impact Analysis Report (TIAR) was prepared by Austin, Tsutsumi & Associates, Inc. for the proposed project in January 26, 2021 to evaluate potential traffic impacts resulting from the proposed project. See **Appendix** "**G**".

Roadways surrounding the project site and serving the region are:

- 1. Honoapi'ilani Highway, east of the project site, is a north-south State Department of Transportation (SDOT) Highways Division roadway, two-way, two-lane undivided arterial highway with posted speeds ranging from 30 miles per hour (mph) to 45 mph. Separate right turn lanes are provided at all major intersections from Wailuku to Waikapu.
- 2. Ku'ikahi Drive that borders the project site, is a County east-west roadway, two-way, two-lane, undivided collector road with posted speeds ranging from 25 mph to 30 mph.
- 3. Maui Lani Parkway that connects to Ku'ikahi Drive, is a County east-west roadway, two-way, two-lane divided collector road which provides a connection for the Waiale area to other regional roads.
- 4. Waiale Road, a County north-south roadway, is a two-way, two-lane, undivided collector road with posted speeds ranging from 25 mph to 30 mph. It serves as the southern connection to Lower Main Street, extends through the Kehalani Village Center, and ends in Waikapu at East Waiko Road.
- 5. East Waiko Road, a County east-west roadway, is a two-way, two-lane, undivided collector road with posted speeds ranging from 20 mph to 25 mph. East Waiko Road connects to the Honoapi'ilani Highway at its west terminus at a signalized intersection.
- 6. Kehalani Parkway, mostly a County roadway, is a two-way, two-lane divided collector road with posted speeds ranging from 20 mph to 30 mph. The parkway starts from the lower Kehalani residential subdivisions and extends east across Honoapi'ilani Highway in the mauka direction then loops around Pu'u Kukui Elementary School

and the upper Kehalani residential subdivisions. The parkway physically continues to loop south and connect to Kuʻikahi Drive across the proposed project access road. However, the mauka portion of the road is blocked while the Anuhea residential homes are being constructed.

- 7. Nokekula Loop, Ha'awi Street and Kokololio Street, are east-west local County roads posted at 20 mph, which connect to Waiale Road and service the Waikapu Gardens, Phase I residential neighborhood.
- 8. Ohana Hana Loop, is an east-west local road posted at 20 mph that connects to Waiale Road and services the Waikapu Gardens Phase II residential neighborhood.
- 9. Kaohu Street, a County east-west local road posted at 20 mph, is a two-way, two-lane undivided local road servicing the County building, residential areas, and various businesses.
- 10. Olomea Street, a County east-west local road posted at 20 mph, is a two-way, two-lane undivided road servicing the Kehalani residential subdivision.

Existing traffic volumes were captured between March through May 2019 at the following roadway intersections surrounding the project area/region were analyzed on their existing operating Level of Service (LOS). See **Figure 13**.

 Kamehameha Avenue/Maui Lani Parkway, most recently converted to a roundabout but was previously a 4-way stop controlled intersection where eastbound and southbound approaches operate at LOS F in the AM peak hour. The eastbound, westbound, and southbound through/right turn movement operates at LOS F with overcapacity conditions during the PM peak hour.

Waiale Road/Kaohu Street/Oluolu Drive is a four-way stop controlled intersection with shared lanes along its approaches. During the AM peak hour, the Waiale Road approaches operate at LOS F or overcapacity conditions. During the PM peak hour, the southbound approach operates at LOS F and overcapacity conditions with the northbound left turn/through movement operating at LOS E.

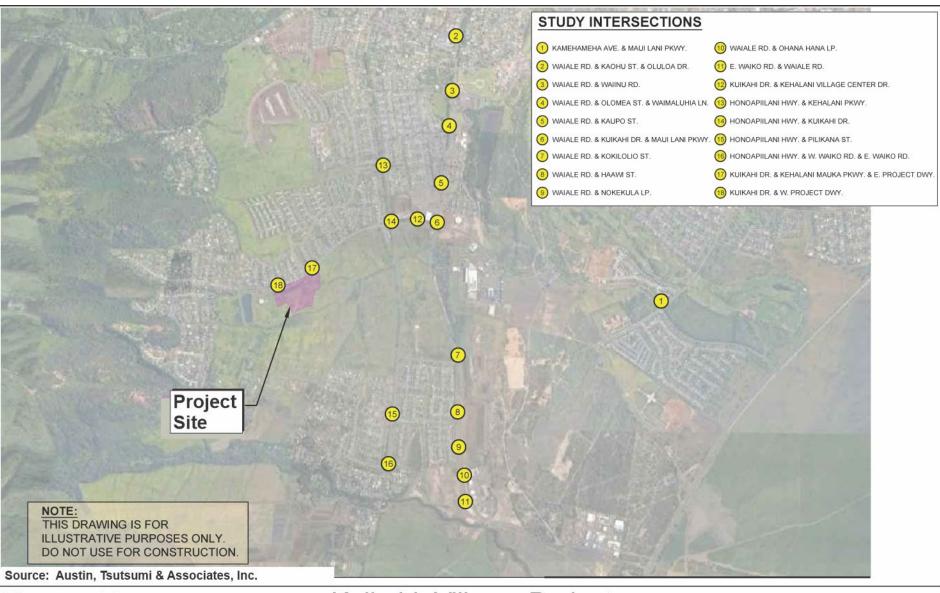


Figure 13



Kuikahi Village Project Traffic Study Intersection

NOT TO SCALE

Prepared for: Kuikahi Properties, LLC



- 2. Waiale Road/Waiinu Road, an unsignalized T-intersection that is with stop control on the westbound Waiinu Road approach, operates at LOS F and overcapacity conditions with lengthy delays in both the AM and PM peak hours
- Waiale Road/Olomea Street, is an unsignalized intersection with stop control on the eastbound Olomea Street approach. There is the Maui Community Correctional Center driveway slightly offset to the south of Olomea Street. During the AM and PM peak hour, the eastbound movement operates at LOS F and overcapacity conditions.
- 4. Waiale Road/Kaupo Street , is an unsignalized T-intersection with exclusive left turn and right turn lane along the Kaupo Street approach and no separate turn lanes on the Waiale Road approaches. Eastbound left turn movements operate at LOS F during the AM and PM peak hours with overcapacity conditions during the AM peak hour.
- 5. Waiale Road/Ku'ikahi Drive/Maui Lani Parkway is a signalized intersection with exclusive left turn lanes on all approaches and an exclusive right turn lane on the westbound approach. All movements currently operate at LOS C or better during the AM and PM peak hour except with a 20 to 30 minute queue in the AM beyond the length of the left turn storage lane into the Kehalani Village Drive backing up to Honoapi'ilani Highway.
- 6. Waiale Road at Kokololio Street, Ha'awi Street, Nokekula Loop, and Ohana Hana Loop are unsignalized T-intersections servicing the Waikapu Gardens Phase I and II developments. All movements at the intersections operate at LOS B or better during the AM and PM peak hours.
- 7. Waiale Road/Waiko Road is an unsignalized T-intersection with shared lanes on all approaches with the southbound approach being stop controlled. All movements operate at LOS D or better during the AM and PM peak hours.
- 8. Kuʻikahi Drive/Kehalani Village Center Access is an unsignalized Tintersection with exclusive left turn lanes in the eastbound and southbound directions with all movements operating at LOS D or better during the AM and PM peak hours except the southbound left turn movement that operates at LOS E during the PM peak hour.

- Honoapi'ilani Highway/Ku'ikahi Drive is signalized intersection with exclusive left turn and right turn lanes on all approaches. All movements currently operate at LOS D or better during the AM and PM peak hours.
- 10. Honoapi'ilani Highway/Pilikana Street is a signalized T-intersection with an exclusive northbound left turn lane and southbound channelized exclusive right turn lane. All movements operate at LOS C or better during the AM and PM peak hours.
- 11. Honoapi'ilani Highway/Waiko Road is a signalized intersection with exclusive left turn lanes on the northbound and southbound approaches and exclusive right turn lanes on the eastbound and southbound approaches. All movements operate at LOS C or better during the AM and PM peak hours.
- 12. Honoapi'ilani Highway/Kehalani Parkway is a signalized intersection with exclusive left turn and right turn lanes on all approaches. All movements operate at LOS D or better during the AM and PM peak hours. There is a period of heavy traffic for about 30 minutes during AM peak hour between 7:15-7:45 AM from traffic generated by the Pu'u Kukui Elementary School. Queueing on Honoapi'ilani Highway at Aupuni Street fronting the Wailuku Library also results from the Wailuku Elementary School morning drop-offs. Northbound traffic on the highway queues back to Kehalani Parkway for about 5 to 10 minutes.

b. Potential Impacts and Proposed Mitigation Measures

Traffic projections for the Base Year 2024, when the proposed project is anticipated to be completed, were determined based on existing traffic counts, the Maui Regional Travel Demand Model growth forecast for years of 2024 and 2035, and nearby developments in the immediate vicinity of the project. The growth rate was determined to be approximately 1.9 percent per year. Future developments accounted for expected to be built by 2024 are as follows:

- Waikapu Light Industrial (8.5-acre industrial development along Waiko Road)
- Waiale Business Park (formerly known as Waiko Light Industrial Subdivision, 102,414 square feet (s.f.) of commercial space and 215,195 s.f. of light industrial uses)

- Emmanuel Lutheran Pre-School (build out to include K-8 school with church/office buildings)
- Maui Lani Village Center (Infill anticipated of 19,700 s.f. commercial, 62,400 s.f. office, and 75,500 s.f. warehouse space)
- Kehalani Village Center (infill development of the existing retail center plus 56 multi-family dwelling units)
- Waiale Elua (70 single-family units with neighborhood park)
- Kehalani Mauka (Expansion of existing residential subdivision with 304 single-family plus 54 multi-family units)
- Waikapu Country Town (150 single-family units)
- Waikapu Ventures Affordable Housing (68 single-family plus 12 multi-family units)
- Heritage at Maui Lani (25 single-family units)
- Wailuku Apartment (324 multi-family units)
- Maui Lani Parkways Phase 3 (74 single-family units)
- Ag Subdivision Lots (5-ag lots proposed)
- Gentry (Maui Lani Ph. 8B and 8C) (291 single-family units)
- Pu'unani Homestead (161 single-family units)

Also, the Maui Lani Parkway/Kamehameha Avenue intersection was converted to a single-lane roundabout by the County in July 2020 and is included in the Base Year 2024 analysis. Some future planned roadway projects like the Waiale Road Extension and Waiko Road Improvements projects are not likely to be built by Year 2024 and were not included in the analysis.

The County's planned installation of a roundabout at the Waiale Road/Waiinu Road intersection, which will help the flow of traffic, is accounted for in the analysis.

Also, at various stages of occupancy of the Wailuku Apartments project, the signal timing at the Waiale Road/Ku'ikahi Drive intersection will be

optimized. The signalization timing was a traffic mitigation measure for the Wailuku Apartments project.

The planned Maui Lani Parkway Extension anticipated to connect the existing Maui Lani Parkway and extend northward to intersect with Waiinu Road where Maui Lani Parkway and Pu'umele Street exist, will provide an alternate route into Kahului from Wailuku to alleviate traffic congestion along Waiale Road. Although the completion of this road is unknown, Base Year conditions were analyzed with and without the Maui Lani Parkway Extension.

For the Base Year 2024 analysis, with additional traffic generated by nearby developments plus defacto growth, LOS and turning movements at the various intersections studied throughout the network will worsen. If the Maui Lani Parkway Extension is built, a large portion of traffic is anticipated to be rerouted way from Waiale Road to mitigate much of the impacts from growth and background developments. Refer to **Appendix "G"**. The roundabout at Kamehameha Avenue/Maui Lani Parkway is anticipated to have all movements operate at LOS D or better for both peak hours except the southbound approach anticipated to operate at LOS E during the PM peak hour, below capacity.

The Waiale Road/Kaohu Street intersection movements on the Waiale Road approaches will continue to operate at LOS F and overcapacity as existing. Although signal warrants are met at this intersection, physical right-of-way and alignment constraints make it difficult to signalize.

The Waiale Road/Waiinu Road will experience similar conditions as at Waiale Road/Kaohu Street. Once implemented, the Maui Lani Parkway Extension would improve the LOS E and below capacity conditions at the Waiale Road/Waiinu Road intersection.

Signal warrants are met for existing conditions at the Waiale Road/Olomea Street intersection, although not planned at this time. Therefore, the intersection will continue to operate with over capacity conditions. Median refuge lanes may help to reduce delays for left turns out of Olomea Street. The Maui Lani Parkway Extension is again anticipated to reduce traffic along Waiale Road to generally improve operations at the Waiale Road/Olomea Street intersection.

At Waiale Road/East Waiko Road, a signal is anticipated if no provisions are made to provide separate left turn and right turn lanes on the Waiale Road approach.

With the Wailuku Apartments driveway added across the Kuʻikahi Drive/Kehalani Village Center intersection, it is anticipated to operate at LOS F in both peak hours. However, a signal warrant was not met with projected Base Year volumes.

The Honoapi'ilani Highway/Kehalani Parkway intersection will operate at LOS E conditions compared to its existing LOS D or better and continue to experience the 30 minutes of queueing attributed to the Pu'u Kukui Elementary School morning traffic.

Finally, for the Honoapi'ilani Highway/Ku'ikahi Drive intersection, the eastbound approach and southbound left turns are anticipated to operate at LOS E and below capacity. However, overall the intersection will operate adequately at LOS D or better during both peak hours.

At Future Year 2024, the proposed project traffic generated is approximately 87 and 106 new trips during the AM and PM peak hours, respectively. All study intersections are generally forecast to operate at similar LOS to Base Year 2024 conditions. The project's anticipated impact to Honoapi'ilani Highway is 5 to 18 vehicles per peak direction and 3 to 12 vehicles along Waiale Road. At both of the proposed project driveways off Ku'ikahi Drive, all movements are anticipated to operate at LOS B or better during both peak hours. The project anticipates inclusion of a mini roundabout at the main entrance to the project across Kehalani Mauka Parkway/Ku'ikahi Drive provided all design criteria can be met during the design phase of the project.

The TIAR provided the following recommendations to address Base Year 2024 conditions without the proposed project, which includes various Waiale Road Corridor improvements such as:

- Consider various traffic control treatment option at Waiale Road/Kaohu Street intersection that may fit within the constraints of the site.
- Inclusion of median refuge lanes at unsignalized intersections with Waiale Road to ease entry of left turns onto Waiale Road.
- At Waiale Road/Ku'ikahi Drive intersection, lengthen the southbound left turn lane by shortening the existing northbound left turn into Waimaluhia Lane. Signal timing should be continually optimized with new developments.

The TIAR provided the Future Year 2024 recommendations for mitigation with the proposed project:

- At the Waiale Road/Ku'ikahi Drive intersection, optimize signal timing.
- At the proposed Ku'ikahi Drive/Kehalani Mauka Parkway/Proposed Project Access intersection, consider a mini-roundabout when Kehalani Mauka Parkway fully opens to through traffic. Future design of the roundabout shall provide adequate horizontal and vertical sight distance on all approaches while maintaining an acceptable grade coupled with enforcement of speeds along the relatively steep Ku'ikahi Drive approaches.

The TIAR concluded that with the two (2) mitigation measures noted above, the proposed project is not anticipated to have a significant impact on traffic in the area.

2. Water

a. Existing Conditions

A Preliminary Engineering Report (PER) was prepared by Otomo Engineering, Inc. for the proposed project. Refer to **Appendix "B"**.

Water for the Wailuku area is provided by the County's Department of Water Supply (DWS) Central Maui System. Water is provided from wells in the Iao and Waihe'e aquifers. The previous landowner participated in a water infrastructure upgrade project for the DWS system, whereby a planned 300,000 gallon storage tank was expanded to 500,000 gallons to accommodate the previous project. The 500,000 gallon tank was constructed and is located at the 835 feet elevation, near the project site.

The PER noted that there is an existing 8-inch County force main that delivers water from the 3.0 MG Waiale Tank to the 1.5 MG tank at the 670 feet elevation. The 8-inch force main traverses along Kuʻikahi Drive, to the 1.5 MG tank, which is located immediately west of the project site. The proposed development between the 560 and 725 foot elevation will be serviced by the Kehalani Mauka high level water service. Storage for the project will be provided by the existing 500,000 gallon tank.

b. <u>Potential Impacts and Mitigation Measures</u>

The PER noted that in accordance with the DWS' Domestic Consumption Guidelines for multi-family residential development, the average daily demand for the 120 multi-family units, six (6) single-family units, 18 duplexes, 14 townhomes, 16 live-work units and 28 studios is anticipated to be approximately 111,040 gallons per day (GPD). Following the review of the Draft EA, the project was revised to reduce the number of duplex units from 34 to 18 and include 14 townhome units. The townhome units were included in the original duplex units. Fire flow for a low-rise multifamily development is 1,500 gallons per minute for a 2-hour duration. Fire hydrants will be installed within the project site with a maximum spacing of 250 feet.

Lastly, it is noted that as a 100 percent affordable housing project, the Applicant will seek an exemption through the MCC Chapter 2.97 application process for the Water Availability (Chapter 14.12) provision of the MCC. Further, in 2007 and 2012, Kehalani Mauka entered into water use agreements with the previous property owner, Towne Development of Hawaii, for 225,000 gallons of water storage in the Kehalani Mauka water storage tank. The Applicant purchased Parcel 3 from Towne Development of Hawaii, which included said water storage credits. As such, the Applicant (Kuikahi Properties LLC) intends to utilize these water storage credits for the proposed project.

3. Wastewater

a. Existing Conditions

The Wailuku area is served by the County of Maui's sewer system, which collects wastewater and conveys it to the Wailuku-Kahului Wastewater Reclamation Facility (WKWWRF) for treatment and disposal.

The PER noted that there are existing 8-inch sewerlines along Kuʻikahi Drive, in proximity to the project site. The existing sewerlines travel east along Kuʻikahi Drive which connects to a sewer manhole at the intersection of Kuʻikahi Drive and Waiale Road. From that point, the existing sewer system travels north along Waiale Road, Lower Main Street and crosses Waiehu Beach Road to discharge into the Wailuku Wastewater Pump Station (WWPS). The WWPS is located makai of the Waiehu Beach Road and Kahului Beach Road intersection. The WWPS then pumps the wastewater through a 24-inch force main to the WKWWRF for treatment.

b. <u>Potential Impacts and Mitigation Measures</u>

The PER noted that the proposed project, with its 120 multi-family units, six (6) single-family units, 18 duplexes, 14 townhomes, 16 live-work units and 28 studios are anticipated to generate approximately 52,840 GPD of wastewater. Similar to the explanation on the water use for the project, the project was revised to reduce the number of duplex units from 34 to 18 and to include 14 townhomes. The townhome units were originally included in the 34 duplex units. The proposed project will include an onsite sewer collection system which will collect wastewater from the units and connect to the County's existing sewer system within Ku'ikahi Drive. The onsite sewer improvements will be designed to County standards. Refer to **Appendix "B"**.

4. <u>Drainage System</u>

a. <u>Existing Conditions</u>

The elevations at the project site range from approximately 664 feet above mean sea level (amsl) at the northwestern corner of the site to approximately 540 feet amsl at the eastern end of the site, with an average slope of approximately 10.6 percent. Refer to **Appendix "B"**.

As previously noted, there is an existing dam/reservoir located above the DWS' 500,000 gallon storage tank, on the north side of the project site. The dam/reservoir receives water from an irrigation ditch as well as drainage from the Wailuku Heights subdivision. See **Figure 14**.

There are two (2) existing drainageways that traverse through Parcel 3. The first drainageway is on the south side of the reservoir/dam and the DWS' 500,000 gallon tank. The PER noted that according to the as-built plans and drainage report for the Wailuku Heights Unit 1, the 100-year flow at South Alu Road is 611.7 cubic feet per second (cfs). The second drainageway is parallel to and outside of the southern boundary of the project site. The as-built plans and drainage report for the Wailuku Heights Unit 1 noted that the 100-year flow at South Alu Road in this vicinity is 619.9 cfs. Both drainageways cross South Alu Road with 11.5 foot by 7.3 foot arch pipe culverts. The two (2) existing drainageways flow in west to east direction and eventually merge makai (east) of the project site. The flows from the existing drainageways continue toward Honoapi'ilani Highway. The PER noted that the estimated existing 50-year, 1-hour storm runoff from the project site is 23.51 cfs, with a corresponding runoff volume of 32.446 cubic feet.

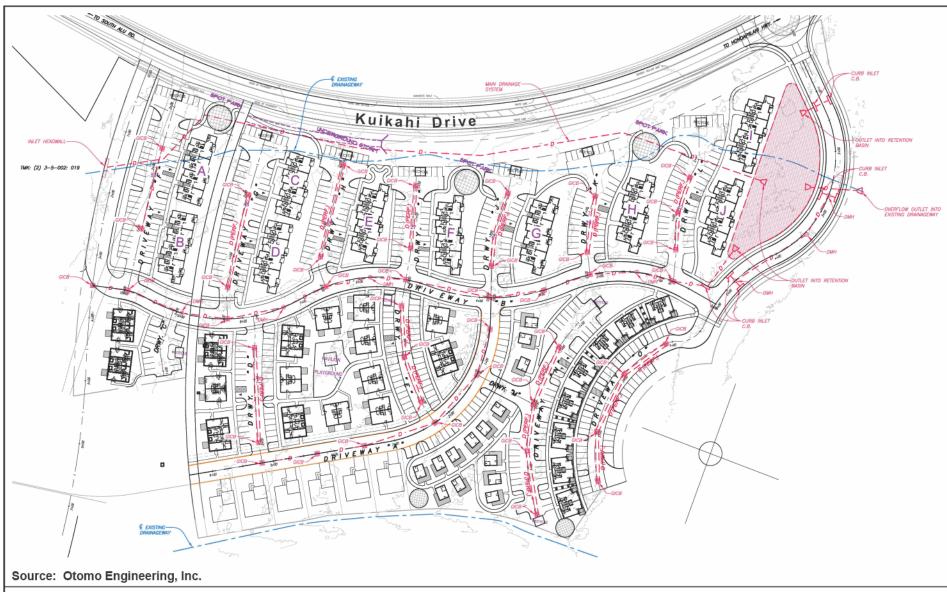


Figure 14

Kuikahi Village Project Preliminary Drainage Plan

NOT TO SCALE



b. <u>Potential Impacts and Mitigation Measures</u>

Following the build out of the project, the PER estimated that the 50-year, 1-hour storm runoff would be 66.45 cfs, with a corresponding storage volume of 118,619 cubic feet. There will be a net increase in runoff of 42.94 cfs, due to the development of the project. The corresponding increase in runoff volume will be 86,173 cubic feet. Refer to **Appendix "B"**.

The existing southern drainageway will not be altered and offsite runoff will continue to sheet flow in a westerly direction as it is currently. Underground culverts will be installed along sections of the existing northern drainageway. The installation of culverts will accommodate the construction of the structures and parking areas for the proposed project.

A large onsite retention basin will be constructed at the easterly end of the project site. Onsite runoff will be collected by grated inlet catch basins within the paved parking areas and conveyed to the onsite retention basin. The retention basin and subsurface drainage system will be sized to accommodate more than the increase in the surface runoff volume from a 50-year, 1-hour storm for the project site. An overflow culvert at the retention basin will allow excess runoff to discharge to an outlet which will be located within the existing northern drainageway. At the outlet, runoff will continue downstream along its present drainage pattern, at a flow less than the pre-development rate.

The drainage design criteria will be to minimize any alterations to the natural pattern of the existing onsite surface runoff and reduce the quality of runoff sheet flowing from the project to the downstream properties. Offsite runoff from the drainage areas mauka of South Alu Road will continue to flow through the project site along its present route. The proposed project's drainage system will be designed in accordance with the County of Maui's Rules for Design of Storm Drainage Facility and Rules for the Design of Storm Water Treatment Best Management Practices.

Lastly, the Applicant is currently working with the Department of Public Works (DPW) to remove the outlet of the existing 66-inch culvert from the dam/reservoir to a new retention basin (planned by the DPW) which will be sized to accommodate the flow from the Wailuku Heights subdivision. The site of the new retention basin is being considered south of the existing dam/reservoir. The Applicant has met with the State DLNR Engineering-Dam Safety Division to discuss alternatives to reduce the height of the dam for possible declassification. This action is being pursued separately from the proposed action. Refer to **Appendix "B"**.

5. <u>Electric, Telephone, and Cable</u>

a. Existing Conditions

There are existing underground electrical, telephone, and cable transmission lines provided by Hawaiian Electric Company, Ltd (Maui Electric), Hawaiian Telcom, and Spectrum Cable, respectively, along Kuʻikahi Drive adjacent to the project site. Refer to **Appendix "B"**.

b. Potential Impacts and Mitigation Measures

Hawaiian Electric Company, Hawaiian Telcom, and Spectrum Cable (formerly Oceanic Time Warner) will be able to provide electrical, telephone, and cable television services, respectively, for the proposed project. The proposed electrical, telephone, and cable TV distribution systems to the project site will be serviced from the existing facilities within Kuʻikahi Drive. Within the project, underground utility lines will provide electrical, telephone, and cable television services.

Coordination with the above-mentioned utility service providers will continue to ensure that systems planning and design can be programmed consistent with the project development schedule.

E. CUMULATIVE AND SECONDARY IMPACTS

Pursuant to the Hawai'i Administrative Rules, Chapter 200, Section 11-200.1-2, entitled Environmental Impact Statement Rules, a cumulative impact means:

...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumuative impacts can result from individually minor but collectively significant actions taking place over a period of time.

"Secondary impacts" or "indirect impacts" are defined as:

...effects that are caused by the action or are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems including ecosystems.

Cumulative and secondary impacts can be viewed as actions of others that are taken because of the presence of the project. Secondary impacts from highway projects, for

example, can occur because they can induce development by removing one (1) of the impediments to growth.

The project is proposed to be implemented in an area developed with residential subdivisions of a similar nature. The proposed project is not a phase of a larger action, nor does it represent a committment to such actions. Given the surrounding residential developments, significant environmental impacts are not anticipated as a result of the project. Although the proposed project requires the provision of basic infrastructure, such as water and wastewater service, these requirements are not considered significant as the project will be developed within the existing service limits for these services. As previously noted, the TIAR concluded that the proposed project is anticipated to generate five (5) to 18 vehicles per peak hour, per direction along Honoapi'ilani Highway and three (3) to 12 vehicles along Waiale Road. Two (2) improvements were recommended by the TIAR to mitigate traffic from the proposed project as well as the anticipated increase in traffic in the area, generated by other proposed projects. One (1) of the recommended mitigation measures is the construction of a roundabout at one (1) of the project's driveways with Ku'ikahi Drive. The Applicant is proposing to include this improvement as part of the project. As such, no cumulative impacts are anticipated as a result of the project.

Secondary impacts are those which have the potential to occur late in time or farther in distance, but are still reasonably foreseeable. They can be viewed as actions of others that are taken because of the presence of a project. The proposed project involves the development of 202 residential units in Wailuku. However, as previously discussed, the future residents will likely be from Maui and will consist of households earning between 60 to 140 percent of the AMI. As such, secondary impacts related to population increase in the region are not anticipated. Further, the proposed project will be located in the midst of other similar residential developments. Among the other residential developments in the area that were included in the TIAR analysis were the Wailuku Apartments, Pu'unani Homestead, and Waikapu Country Town as well as the build out of the Kehalani master planned project. The TIAR also included commercial and industrial projects planned within the project's vicinity in its traffic analysis. As such, given the surrounding development, significant environmental impacts are not anticipated as a result of the project. Therefore, with the proposed mitigation measures, the project is not anticipated to result in significant adverse secondary impacts.

RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES, AND CONTROLS



III. RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES, AND CONTROLS

A. <u>STATE LAND USE DISTRICTS</u>

Pursuant to Chapter 205, Hawai'i Reivsed Statutes (HRS), all lands in the State have been placed into one (1) of four (4) major land use districts by the State Land Use Commission. These land use districts are designated "Urban", "Rural", "Agricultural", and "Conservation". The project site is located within the "Agricultural" district. See **Figure 15**. The project area is less than 15 acres and as such, the Applicant will be seeking approval from the Maui County Council for a District Boundary Amendment from the State Land Use Commission (SLUC) to re-designate the project area to "Urban".

B. HAWAI'I STATE PLAN

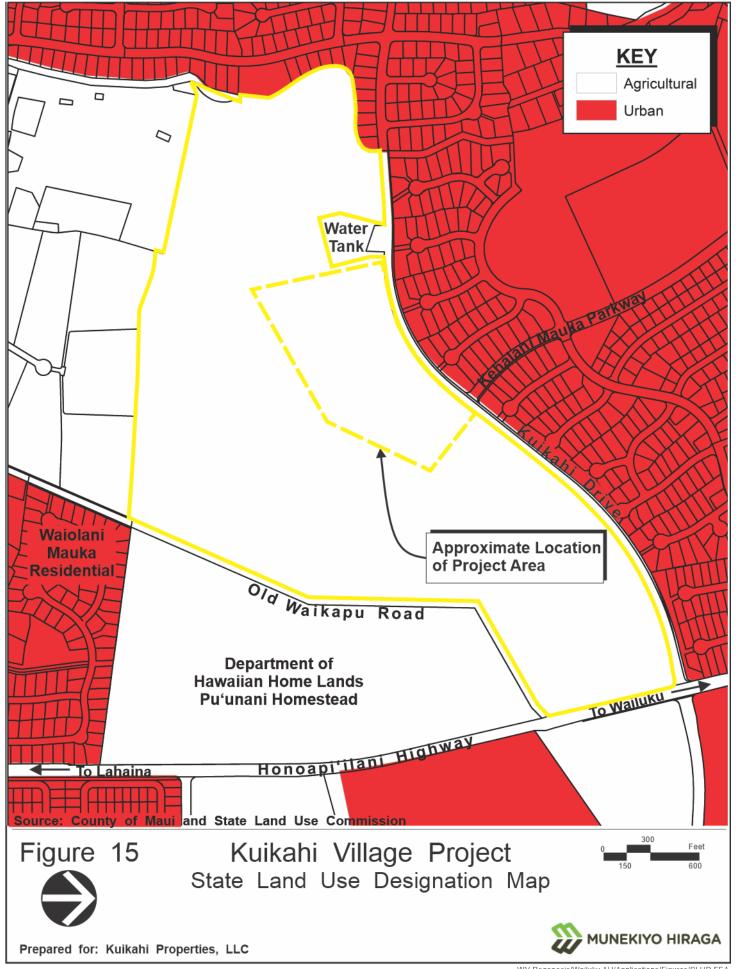
Chapter 226, HRS, also known as the Hawai'i State Plan, is a long-range comprehensive plan which serves as a guide for the future long-term development of the State by identifying goals, objectives, policies, and priorities, as well as implementation mechanisms. The Plan consists of three (3) parts. Part I includes the Overall Theme, Goals, Objectives, and Policies; Part II includes Planning, Coordination, and Implementation; and Part III establishes Priority Guidelines. Part II of the State Plan covers its administrative structure and implementation process.

The overall theme of the Hawai'i State Plan is governed by the following general principles.

- 1. Individual and family self-sufficiency
- 2. Social and economic mobility
- 3. Community or social well-being

In consonance with the foregoing principles, the Hawai'i State Plan identifies three (3) clarifying goals:

- A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai'i's present and future generations.
- A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical wellbeing of the people.



3. Physical, social, and economic well-being, for individuals and families in Hawai'i, that nourishes a sense of community responsibility, of caring, and of participation in community life.

This section of the environmental assessment examines the applicability of the proposed action as it relates to the objectives, policies, and priority guidelines of the Hawai'i State Plan, as set forth in HRS Sections 226-5 through 226-27.

The table below summarizes the relationship between the proposed action and the goals of the Hawai'i State Plan. The relationship between the action and the goals are categorized into the following groups. More detailed analysis and discussion, including the methodology used, is presented in **Appendix "H"**.

- 1. <u>Directly applicable</u>: the action and its potential effects directly advances or promotes the objective, policy or priority guideline.
- 2. <u>Indirectly applicable</u>: the action and its potential effects indirectly supports or advances the objective, policy or priority guideline.
- 3. **Not applicable**: the action and its potential effects have no direct or indirect relationship to the objectives and policies of the Hawai'i State Plan.

In general, a proposed action's applicability to the objectives, policies and priority guidelines of the Hawai'i State Plan is judged on the basis of the action's direct or indirect relationship to the respective objectives, policies and priority directions. It is recognized that the categorization of "applicability" is subject to interpretation and should be appropriately considered in the context of local and regional conditions. The analysis presented in **Table 4** and summarized below focuses on key elements of the proposed action's relationship to the Hawai'i State Plan. Detailed discussion on the applicability of the proposed action to each goal and related objectives, policies, and implementing actions of the Hawai'i State Plan is provided in **Appendix "H"**.

Table 4. Hawai'i State Plan Analysis Summary

Table 4. Hawaiʻi State Plan Analysis Summary			
Hawai'i State Plan, Chapter 226, HRS Part I. Overall Themes, Goals, Objectives and Policies Key: DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable	DA	IA	NA
HRS 226-1: Findings and Purpose			
HRS 226-2: Definitions			
HRS 226-3: Overall Theme			
 HRS 226-4: State Goals. In order to guarantee, for the present and future ge elements of choice and mobility that insure that individuals and groups may desired levels of self-reliance and self determination, it shall be the goal of the 3 (1) A strong, viable economy, characterized by stability, diversity, and growth the fulfillment of the needs and expectations of Hawaii's present and future (2) A desired physical environment, characterized by beauty, cleanliness, quie systems, and uniqueness, that enhances the mental and physical well-being. Physical, social, and economic well-being, for individuals and families nourishes a sense of community responsibility, of caring, and of participatilife. 	/ approstate to state	each enabl ratior le na e peo waii,	their eve: es ns. tural ople. that
Chapter 226-5 Objective and Policies for Population			
<u>Objective</u> : It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic and social objectives contained in this chapter.		✓	
Chapter 226-6 Objectives and policies for the economy – – in general			
<u>Objectives</u> : Planning for the State's economy in general shall be achievement of the following objectives:	directed	d to	ward
(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawaii's people, while at the same time stimulating the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			✓
(2) A steadily growing and diversified economic base that is not overly dependent on a few industries, and includes the development and expansion of industries on the neighbor islands.		✓	
Chapter 226-7 Objectives and policies for the economy agriculture.			
<u>Objectives</u> : Planning for the State's economy with regard to agriculture s towards achievement of the following objectives:	hall be	dire	cted
(1) Viability of Hawaii's sugar and pineapple industries.			✓
(2) Growth and development of diversified agriculture throughout the State.			✓
(3) An agriculture industry that continues to constitute a dynamic and essential component of Hawaii's strategic, economic, and social well- being.			✓
Chapter 226-8 Objective and policies for the economy – – visitor industry			
<u>Objective</u> : Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawaii's economy.			√

Hawaiʻi State Plan, Chapter 226, HRS Part I. Overall Themes, Goals, Objectives and Policies Key: DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable	DA	IA	NA
Chapter 226-9 Objective and policies for the economy – – federal expendi			NA
Objective: Planning for the State's economy with regard to federal expenditures shall be directed towards achievement of the objective of a stable federal investment base as an integral component of Hawaii's economy.			✓
Chapter 226-10 Objective and policies for the economy – – potential growt activities.	h and i	nnov	ative
<u>Objective</u> : Planning for the State's economy with regard to potential growth and innovative activities shall be directed towards achievement of the objective of development and expansion of potential growth and innovative activities that serve to increase and diversify Hawaii's economic base.			✓
Chapter 226-10.5 Objectives and policies for the economy information	indus	stry.	
Objective: Planning for the State's economy with regard to telecommunications and information technology shall be directed toward recognizing that broadband and wireless communication capability and infrastructure are foundations for an innovative economy and positioning Hawaii as a leader in broadband and wireless communications and applications in the Pacific Region.			✓
Chapter 226-11 Objectives and policies for the physical environment – shoreline, and marine resources.	– lan	d ba	sed,
<u>Objectives:</u> Planning for the State's physical environment with regard shoreline, and marine resources shall be directed towards achievement objectives:			
(1) Prudent use of Hawaii's land-based, shoreline, and marine resources.		✓	
(2) Effective protection of Hawaii's unique and fragile environmental resources.			✓
Chapter 226-12 Objective and policies for the physical environmentural beauty, and historic resources.	nt – –	- sce	enic,
<u>Objective</u> : Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawaii's scenic assets, natural beauty, and multi-cultural/historical resources.	✓		
Chapter 226-13 Objectives and policies for the physical environment – water quality.	– land	, air,	and
<u>Objectives</u> : Planning for the State's physical environment with regard to lar quality shall be directed towards achievement of the following objectives.	nd, air,	and	water
(1) Maintenance and pursuit of improved quality in Hawaii's land, air, and water resources.		✓	
(2) Greater public awareness and appreciation of Hawaii's environmental resources.		✓	
Chapter 226-14 Objective and policies for facility systems in general.			
<u>Objective</u> : Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.		✓	

Hawaiʻi State Plan, Chapter 226, HRS Part I. Overall Themes, Goals, Objectives and Policies Key: DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable	DA	IA	NA
Chapter 226-15 Objectives and policies for facility systems – – solid and			
Objectives: Planning for the State's facility systems with regard to solid are shall be directed towards the achievement of the following objectives:	-		
(1) Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.		✓	
(2) Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.		✓	
Chapter 226-16 Objective and policies for facility systems – – water.			
<u>Objective</u> : Planning for the State's facility systems with regard to water shall be directed towards achievement of the objective of the provision of water to adequately accommodate domestic, agricultural, commercial, industrial, recreational, and other needs within resource capacities.	✓		
Chapter 226-17 Objectives and policies for facility systems – – transport	ation.		
<u>Objectives</u> : Planning for the State's facility systems with regard to transpodirected towards the achievement of the following objectives:	rtatior	n sha	ll be
(1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.		\	
(2) A statewide transportation system that is consistent with and will accommodate planned growth objectives throughout the State.			✓
Chapter 226-18 Objectives and policies for facility systems – – energy.			
<u>Objectives</u> : Planning for the State's facility systems with regard to energy s toward the achievement of the following objectives, giving due consideration to		e dire	cted
(1) Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;			✓
(2) Increased energy security and self-sufficiency through the reduction and ultimate elimination of Hawaii's dependence on imported fuels for electrical generation and ground transportation.		\	
(3) Greater diversification of energy generation in the face of threats to Hawaii's energy supplies and systems;		✓	
(4) Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use; and			✓
(5) Utility models that make the social and financial interests of Hawaii's utility customers a priority.			✓
(b) To achieve the energy objectives, it shall be the policy of this State to ensure the short- and long-term provision of adequate, reasonably prices, and dependable energy services to accommodate demand.			✓
Chapter 226-18.5 Objectives and policies for facility systems – – telecom	munic	catio	ns.
Objectives: (a) Planning for the State's telecommunications facility systems shall be directed towards the achievement of dependable, efficient, and economical statewide telecommunications systems capable of supporting the needs of the people.			✓

Hawai'i State Plan, Chapter 226, HRS Part I. Overall Themes, Goals, Objectives and Policies			
Key: DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable	DA	IA	NA
(b) To achieve the telecommunications objective, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable telecommunications services to accommodate demand.			✓
Chapter 226-19 Objectives and policies for socio-cultural advancement -	– ho	using	
<u>Objectives</u> : Planning for the State's socio-cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:			
(1) Greater opportunities for Hawaii's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more affordable housing is made available to very low-, low- and moderate-income segments of Hawaii's population.	✓		
(2) The orderly development of residential areas sensitive to community needs and other land uses.	✓		
(3) The development and provision of affordable rental housing by the State to meet the housing needs of Hawaii's people.	✓		
Chapter 226-20 Objectives and policies for socio-cultural advancement -	- – hea	alth.	
<u>Objectives</u> : Planning for the State's socio-cultural advancement with regarbe directed towards achievement of the following objectives:	d to he	ealth s	shall
(1) Fulfillment of basic individual health needs of the general public.			✓
(2) Maintenance of sanitary and environmentally healthful conditions in Hawaii's communities.			✓
(3) Elimination of health disparities by identifying and addressing social determinants of health.			✓
Chapter 226-21 Objectives and policies for Socio-cultural advancement	- – ed	ucati	on.
<u>Objective</u> : Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.		✓	
Chapter 226-22 Objective and policies for socio-cultural advanceme services.	ent –	- sc	cial
<u>Objective</u> : Planning for the State's socio-cultural advancement with regard to social services shall be directed towards the achievement of the objective of improved public and private social services and activities that enable individuals, families, and groups to become more self-reliant and confident to improve their well-being.			✓
Chapter 226-23 Objective and policies for socio-cultural advancement –	– leisu	ıre.	
Objective: Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.			✓

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The Kuikahi Village Project directly and indirectly supports the goals and objectives of the Hawai'i State Plan as the proposed action consists of the development of approximately 202 affordable housing units which will be affordable to families living on Maui. As part of the Chapter 343, HRS review process, this EA has been prepared to evaluate the potential impacts resulting from the project to the natural as well as the socio-economic environment of the State, County, and Maui island. The project directly supports the State's goals related to enhancement and protection of the physical environment, as various technical studies including a Biological Resources Survey, AIS, and CIA have been completed to ensure that natural, historical, cultural, and archaeological resources at the project site have been comprehensively identified and mitigated to the extent necessary by the Applicant. Furthermore, other studies have been completed for the

project such as the TIAR and PER which evaluate and provide recommendations for mitigation measures as they relate to impacts on traffic and other infrastructure, respectfully.

With respect to the State's goals for housing and public safety, the proposed project will cater to local families earning between 60 and 140 percent of the AMI, offering Maui's residents the opportunity to live comfortably in the central, developed town of Wailuku. Furthermore, the project is conveniently located in close proximity to existing businesses, State and County government facilities, schools, and social services, which will directly benefit the project residents by relieving any long commutes to and from these services and facilities. Lastly, the project is centrally-located in a developed area of Wailuku and is an in-fill action, allowing for easier connection to existing infrastructure, and thus, supports the State's goals for facility systems. As such, the Kuikahi Village Project is consistent with the goals and objectives of the Hawai'i State Plan.

Priority Guidelines

"Priority guidelines" means those guidelines which shall take precedence when addressing areas of statewide concern. This section addresses applicability criteria to the priority guidelines set forth in HRS 226-103.

Priority guidelines of the Hawai'i State Plan covers the economy, population growth and land resources, crime and criminal justice, affordable housing, quality education, sustainability, and climate change adaptation.

The table below summarizes the relationship between the proposed action and the priority guidelines of the Hawai'i State Plan. See **Table 5**. More detailed discussion is presented in **Appendix "H"**.

Table 5. Hawai'i State Plan Priority Guidelines Analysis Summary Hawai'i State Plan, Chapter 226, HRS Part I. Overall Themes, Goals, **Objectives and Policies Key:** DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable Chapter 226-101: Purpose. The purpose of this part is to establish overall priority guidelines to address areas of statewide concern. Chapter 226-102: Overall direction. The State shall strive to improve the quality of life for Hawaii's present and future population through the pursuit of desirable courses of action in seven major areas of statewide concern which merit priority attention: economic development, population growth and land resource management, affordable housing, crime and criminal justice, quality education, principles of sustainability, and climate change adaptation. Chapter 226-103: Economic priority guidelines. (a) Priority guidelines to stimulate economic growth and encourage business expansion and development to provide needed jobs for Hawaii's people and achieve a stable and diversified economy (b) Priority guidelines to promote the economic health and quality of the visitor industry

Hawai'i State Plan, Chapter 226, HRS Part I. Overall Themes, Goals, Objectives and Policies Key: DA = Directly Applicable, IA = Indirectly Applicable,			
NA = Not Applicable	DA	IA	N/A
(c) Priority guidelines to promote the continued viability of the sugar and pineapple industries			✓
(d) Priority guidelines to promote the growth and development of diversified agriculture and aquaculture			✓
(e) Priority guidelines for water use and development			✓
(f) Priority guidelines for energy use and development		√	
(g) Priority guidelines to promote the development of the information industry			✓
Chapter 226-104: Population growth and land resources priority guidelines.			
(a) Priority guidelines to effect desired statewide growth and distribution		✓	
(b) Priority guidelines for regional growth distribution and land resource utilization		√	
Chapter 226-105: Crime and criminal justice.			
Priority guidelines in the area of crime and criminal justice			✓
Chapter 226-106: Affordable housing.			
Priority guidelines for the provision of affordable housing	✓		
Chapter 226-107: Quality education.			
Priority guidelines to promote quality education			✓
CHAPTER 226-108: Sustainability			•
Priority guidelines and principles to promote sustainability shall include		✓	
CHAPTER 226-109: Climate change adaptation			•
Priority guidelines and principles to promote climate change adaptation shall include		✓	

As an affordable housing project, the proposed action is directly supportive of the Hawai'i State Plan's Priority Guidelines for affordable housing. The proposed project repurposes agricultural land while providing affordable housing opportunities for various family sizes in an area that is close to the government, business, and commercial centers of Wailuku and Kahului. The project is complementary and consistent with its neighboring residential developments and is also close to service infrastructure and transportation access and services. Further, the project will add diversity to the housing product mix in the region which itself lacks in affordable housing options.

C. STATE FUNCTIONAL PLAN

A key element of the Statewide Planning System is the Functional Plans which set forth the policies, statewide guidelines, and priorities within a specific field of activity. There are 13 Functional Plans which have been developed by the State agency primarily responsible for a given functional area. Together with the County General Plans, the State Functional Plans establish more specific strategies for implementation. In particular, State Functional Plans provide for the following:

- Identify major Statewide priority concerns
- Define current strategies for each functional area
- Identify major relationships among functional areas
- Provide direction and strategies for departmental policies, programs, and priorities
- Provide a guide for the allocation of resources
- Coordinate State and County roles and responsibilities in the implementation of the Hawai'i State Plan

Thirteen (13) Functional Plans have been prepared by State agencies. **Table 6** provides an assessment of the relationship between the proposed action and each of the 13 Functional Plans.

Table 6. Relationship Between the Proposed Kuikahi Village Project and the State Functional Plans

	State Functional Plan	State Coordinating Agency	Purpose	Analysis
1	Agriculture Functional Plan (1991)	Department of Agriculture	Continued viability of agriculture throughout the State	Though the proposed project does involve lands designated as "Agricultural" these lands have been out of agricultural use for decades. Furthermore, the proposed project makes prudent use of these unused agricultural lands to provide affordable housing to Hawai'i residents. The proposed action does not contravene the objectives and policies of this functional plan.
2	Conservation Lands State Functional Plan (1991)	Department of Land and Natural Resources	Addresses issues of population and economic growth and its strain on current natural resources; broadening public use of natural resources while protecting lands and shorelines from overuse; additionally, promotes the aquaculture industry	The proposed project will not utilize any State Conservation lands. Similarly, the project is located inland, and not near the coastline. Best Management Practices (BMPs) will be implemented to prevent adverse impacts to downstream properties and the shoreline.
3	Education State Functional Plan (1989)	Department of Education	Improvements to Hawai'i's educational curriculum, quality of educational staff, and access to adequate facilities	The proposed project will provide for the educational assessment required by the DOE for residential projects.
4	Employment State Functional Plan (1990)	Department of Labor and Industrial Relations	Improve the qualifications, productivity, and effectiveness of the State's workforce through better education and training of workers as well as efficient planning of economic development, employment opportunities, and training activities	The proposed action will result in the creation of jobs through the construction period.
5	Energy State Functional Plan (1991)	Department of Business, Economic Development and Tourism	Lessen the reliance on petroleum and other fossil fuels in favor of alternative sources of energy so as to keep up with the State's increasing energy demands while also becoming a more sustainable island state; achieving dependable, efficient, and economical statewide energy systems	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.

	State Functional Plan	State Coordinating Agency	Purpose	Analysis
6	Health State Functional Plan (1989)	Department of Health	Improve health care system by providing for those who don't have access to private health care providers; increasing preventative health measures; addressing 'quality of care' elements in private and public sectors to cut increasing costs	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
7	Higher Education Functional Plan (1984)	University of Hawaiʻi	Prepare Hawai'i's citizens for the demands of an increasingly complex world through providing technical and intellectual tools	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
8	Historic Preservation State Functional Plan (1991)	Department of Land and Natural Resources	Preservation of historic properties, records, artifacts and oral histories; provide public with information/education on the ethnic and cultural heritages and history of Hawai'i	A HRS 6E submittal was completed for the project and filed with the SHPD. The Applicant will follow the determination provided by the SHPD in regards to archaeological mitigation for the project.
9	Housing State Functional Plan (2017)	Hawaiʻi Housing Finance and Development Corporation	Based largely on joint public/private efforts to finance, build, and maintain an adequate supply of affordable housing. It will be a working tool to guide the State, the counties, as well as the private sector in meeting the overall goal that every Hawaii resident will have the opportunity to live in a safe, decent and affordable home.	The proposed project will provide 202 housing units affordable to families earning 60 percent to 140 percent of the Area Median Income. The proposed action supports the objectives and policies of this functional plan.
10	Human Services State Functional Plan (1989)	Department of Human Services	Refining support systems for families and individuals by improving elderly care, increasing preventative measures to combat child/spousal abuse and neglect; providing means for 'self-sufficiency'	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.

	State Functional Plan	State Coordinating Agency	Purpose	Analysis
11	Recreation State Functional Plan (1991)	Department of Land and Natural Resources	Manage the use of recreational resources via addressing issues: (1) ocean and shoreline recreation, (2) mauka, urban, and other recreation opportunities, (3) public access to shoreline and upland recreation areas, (4) resource conservation and management, (5) management of recreation programs/facilities/areas, and (6) wetlands protection and management	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
12	Tourism State Functional Plan (1991)	Department of Business, Economic Development and Tourism	Balance tourism/economic growth with environmental and community concerns; development that is cognizant of the limited land and water resources of the islands; maintaining friendly relations between tourists and community members; development of a productive workforce and enhancement of career and employment opportunities in the visitor industry	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.
13	Transportation State Functional Plan (1991)	Department of Transportation	Development of a safer, more efficient transportation system that also is consistent with planned physical and economic growth of the state; construction of facility and infrastructure improvements; develop a transportation system balanced with new alternatives; pursue land use initiatives which help reduce travel demand	The proposed action is not anticipated to contravene the objectives and policies of this functional plan.

D. GENERAL PLAN OF THE COUNTY OF MAUI

As indicated by the Maui County Charter, the purpose of the general plan shall be to:

... indicate desired population and physical development patterns for each island and region within the county; shall address the unique problems and needs of each island and region; shall explain opportunities and the social, economic, and environmental consequences related to potential developments; and shall set forth the desired sequence, patterns and characteristics of future developments. The general plan shall identify objectives to be achieved, and priorities, policies, and implementing actions to be pursued with respect to population density, land use maps, land use regulations, transportation systems, public and community facility locations, water and sewage systems, visitor destinations, urban design, and other matters related to development.

Chapter 2.80B of the Maui County Code, relating to the General Plan and Community Plans, implements the foregoing Charter provision through enabling legislation which calls for a Countywide Policy Plan and a Maui Island Plan.

1. <u>Countywide Policy Plan</u>

The Countywide Policy Plan was adopted in March 2010 and is a comprehensive policy document for the islands of Maui County to the year 2030. The plan replaces the General Plan of the County of Maui 1990 Update and provides the policy framework for the development of the Maui Island Plan as well as for updating the nine (9) detailed Community Plans. The Countywide Policy Plan provides broad goals, objectives, policies and implementing actions that portray the desired direction of the County's future. Goals are intended to describe a desirable condition of the County by the year 2030 and are intentionally general. Objectives tend to be more specific and may be regarded as milestones to achieve the larger goals. Policies are not intended as regulations, but instead provide a general guideline for County decision makers, departments, and collaborating organizations toward the attainment of goals and objectives. Implementing actions are specific tasks, procedures, programs, or techniques that carry out policy.

Table 7 below summarizes the relationship between the proposed action and the 11 goals of the Countywide Policy Plan. The relationship between the action and the goals are categorized into the following groups. More detailed analysis and discussion, including the methodology used, is presented in **Appendix "H-1"**.

- 1. <u>Directly applicable</u>: the action and its potential effects directly advances, promotes or affects the relevant goal, objective, or policy.
- 2. <u>Indirectly applicable</u>: the action and its potential effects indirectly supports, advances or affects the objective, policy or priority guideline.

3 <u>Not applicable</u>: the action and its potential effects have no direct or indirect relationship to the objectives and policies of the Countywide Policy Plan.

In general, a proposed action's applicability to the goals, objectives, policies and implementing actions of the Countywide Policy Plan is judged on the basis of the action's direct or indirect relationship to the respective objectives, policies and priority directions. It is recognized that the categorization of "applicability" is subject to interpretation and should be appropriately considered in the context of local and regional conditions. The analysis presented in **Table 7.** and summarized below focuses on key elements of the proposed action's relationship to the Countywide Policy Plan. Detailed discussion on the applicability of the proposed action to each goal and related objectives, policies, and implementing actions of the Countywide Policy Plan is provided in **Appendix "H-1"**.

Table 7. Countywide Policy Plan Analysis Summary

COLINI	TYWIDE POLICY PLAN	ii y		
	DA = Directly Applicable, IA = Indirectly Applicable,			
	lot Applicable)	DA	1.0	NIA
	• • •	DA	IA	NA
	OTECT THE NATURAL ENVIRONMENT			
Goal:	Maui County's natural environment and distinctive open spaces will be preserved, managed, and cared for in perpetuity.	✓		
B. PR	ESERVE LOCAL CULTURES AND TRADITIONS			
Goal:	Maui County will foster a spirit of pono and protect, perpetuate, and reinvigorate its residents" multi-cultural values and traditions to ensure that current and future generations will enjoy the benefits of their rich island heritage.		√	
C. IMF	PROVE EDUCATION			
Goal:	Residents will have access to lifelong formal and informal educational options enabling them to realize their ambitions.		✓	
D. STI	RENGTHEN SOCIAL AND HEALTHCARE SERVICES			
Goal:	Health and social services in Maui County will fully and comprehensively serve all segments of the population.			✓
E. EXI	PAND HOUSING OPPORTUNITIES FOR RESIDENTS	<u> </u>		
Goal:	Quality, island-appropriate housing will be available to all residents.	✓		
F. STR	RENGTHEN THE LOCAL ECONOMY			
Goal:	Maui County's economy will be diverse, sustainable, and supportive of community values.	✓		
G.	IMPROVE PARKS AND PUBLIC FACILITIES			
Goal:	A full range of island-appropriate public facilities and recreational opportunities will be provided to improve the quality of life for residents and visitors.		✓	
H. DIV	ERSIFY TRANSPORTATION OPTIONS			
Goal:	Maui County will have an efficient, economical, and environmentally sensitive means of moving people and goods.		✓	

(Key: I NA = N	TYWIDE POLICY PLAN DA = Directly Applicable, IA = Indirectly Applicable, lot Applicable)	DA	IA	NA	
I. IMP	ROVE PHYSICAL INFRASTRUCTURE				
Goal:	Maui County's physical infrastructure will be maintained in optimum condition and will provide for and effectively serve the needs of the County through clean and sustainable technologies.	✓			
J. PRO	DMOTE SUSTAINABLE LAND USE AND GROWTH MANAGE	MEN.	Γ		
Goal:	Community character, lifestyles, economies, and natural assets will be preserved by managing growth and using land in a sustainable manner.	✓			
K. STI	RIVE FOR GOOD GOVERNANCE				
Goal:	Government services will be transparent, effective, efficient, and responsive to the needs of residents.			✓	
L. MI	L. MITIGATE CLIMATE CHANGE AND WORK TOWARD RESILIENCE				
Goal:	Minimize the causes and negative effects of climate change.		✓		

The goals of the Countywide Policy Plan for Maui County are directly and indirectly applicable and, in most cases, supported by the Kuikahi Village Project. The proposed project makes prudent use of uncultivated agricultural land by providing approximately 202 affordable housing units available to families earning between 60 to 140 percent of the AMI, in an optimal location near other residential developments as well as the government, business, and commercial centers of Wailuku and Kahului. By being in close proximity to these areas, residents will be able to easily access social and commercial services as well as potential job opportunities in the Wailuku-Kahului area which would, hopefully, reduce commute times to and from other areas on Maui.

As previously mentioned, various technical studies and reports have been prepared for the proposed project to ensure that its impact on natural, cultural/archaeological, and historical resources as well as surrounding infrastructure are minimal, or that mitigation measures are implemented by the Applicant to address the project's impacts. Some mitigation measures include the use of BMPs throughout construction and traffic mitigation measures such as traffic signal optimization at the Waiale Road/Ku'ikahi Drive intersection and the installation of a mini-roundabout at the project's east driveway with Ku'ikahi Drive. Additionally, the proposed project has been carefully designed taking into consideration building profiles and massing so as to not adversely impact scenic views and vistas. Sustainability measures such as energy efficient lighting and water conservation plumbing fixtures will be incorporated into the proposed project. Solar hot water heaters or other energy efficient hot water devices may be considered for the multi-family units. Lighting at the project site will be downward shielded to minimize light pollution resulting from the proposed project. The proposed structures will be similar in scale and size to existing residential developments nearby and will be built in accordance with established development standards. Lastly, the Applicant has been coordinating with various County agencies to ensure the availability and capacity of existing infrastructure so that the project can easily connect to these systems.

2. <u>Maui Island Plan</u>

The Maui Island Plan (MIP) is applicable to the island of Maui only, providing more specific policy-based strategies for population, land use, transportation, public and community facilities, water and wastewater systems, visitor destinations, urban design, and other matters related to future growth.

As provided by Chapter 2.80B, the MIP shall include the following components:

- 1. An island-wide land use strategy, including a managed and directed growth plan
- 2. A water element assessing supply, demand and quality parameters
- 3. A nearshore ecosystem element assessing nearshore waters and requirements for preservation and restoration
- 4. An implementation program which addresses the County's 20-year capital improvement requirements, financial program for implementation, and action implementation schedule
- 5. Milestone indicators designed to measure implementation progress of the MIP

The MIP addresses a number of planning categories with detailed policy analysis and recommendations which are framed in terms of goals, objectives, policies and implementing actions. These planning categories address the following areas:

- 1. Population
- 2. Heritage Resources
- 3. Natural Hazards
- 4. Economic Development
- 5. Housing
- 6. Infrastructure and Public Facilities
- 7. Land Use

Additionally, an essential element of the MIP is its directed growth plan which provides a management framework for future growth in a manner that is fiscally,

environmentally, and culturally prudent. Among the directed growth management tools developed through the MIP process are maps delineating urban growth boundaries (UGB), small town boundaries and rural growth boundaries (RGB). The respective boundaries identify areas appropriate for future growth and their corresponding intent with respect to development character.

The Kuikahi Village Project is located in the UGB and RGB of the MIP's Wailuku-Kahului region. It is further noted that the subject property is "Outside of Protected Areas" in the MIP. The proposed project will provide 202 housing units affordable to families earning between 60 and 140 percent of the AMI. See **Figure 16**.

In addition, the proposed project has been reviewed with respect to pertinent goals, objectives, policies, and implementing actions of the MIP. The analysis is presented in the table below.

objectives, policies, and implementing actions of the MIP is provided in **Appendix "H-2"**.

Table 8 below summarizes the relationship between the proposed action and the goals of the MIP. The relationship between the action and the goals are categorized into the following groups. More detailed analysis and discussion, including the methodology used, is presented in **Appendix "H-2"**.

- 1. <u>Directly applicable</u>: the action and its potential effects directly advances or promotes the objective, policy or priority guideline.
- 2. <u>Indirectly applicable</u>: the action's potential effects indirectly supports or advances the objective, policy or priority guideline.
- 3. **Not applicable:** The action and its potential effects have no direct or indirect relationship to the objectives and policies of the Maui Island Plan.

In general, a proposed action's applicability to the MIP is judged on the basis of the action's direct or indirect relationship to the respective objectives, policies and priority directions. It is recognized that the categorization of "applicability" is subject to interpretation and should be appropriately considered in the context of local and regional conditions. The analysis presented in **objectives**, policies, and implementing actions of the MIP is provided in **Appendix "H-2"**.

Table 8 and summarized below focuses on key elements of the proposed action's relationship to the MIP. Detailed discussion on the applicability of the proposed action to each goal and related objectives, policies, and implementing actions of the MIP is provided in **Appendix "H-2"**.

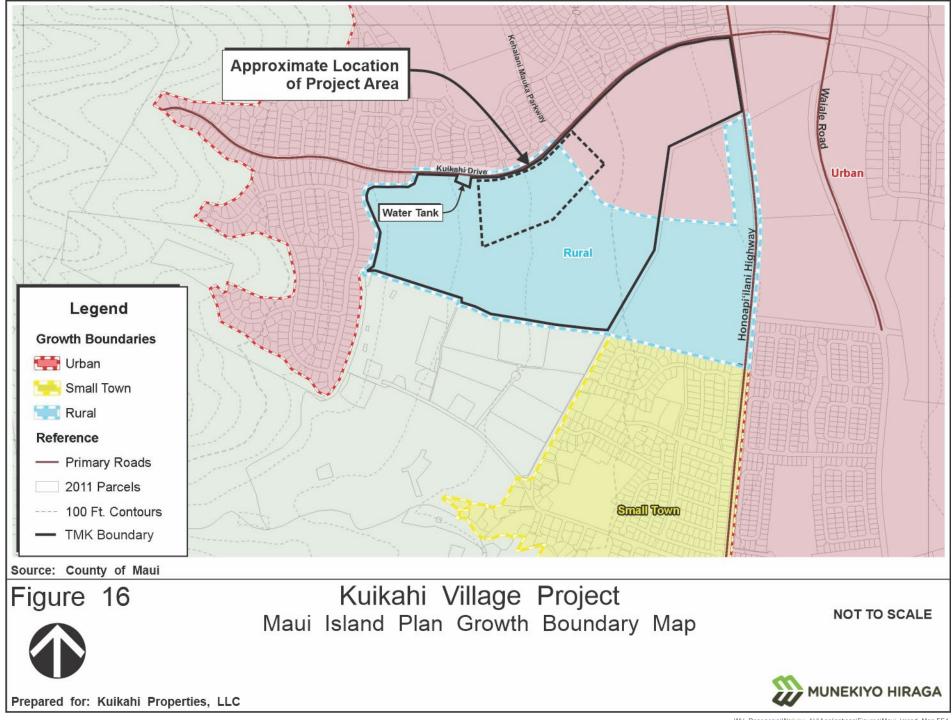


 Table 8. Maui Island Plan Analysis Summary

rable 6. Wadi Island Flan Analysis Summary			
Maui Island Plan Goals, Objectives and Policies Key: DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable	DA	IA	NA
CHAPTER 1 – POPULATION			
1.1 Maui's people, values, and lifestyles thrive through strong, healthy, and vibrant island communities.	✓		
CHAPTER 2 – HERITAGE RESOURCES	,		
CULTURAL, HISTORICAL, AND ARCHAEOLOGICAL RESOURCES	ISSUE	S	
Our community respects and protects archaeological and cultural resources while perpetuating diverse cultural identities and traditions.		✓	
SHORELINE, REEFS, AND NEARSHORE WATERS			
2.2 An intact, ecologically functional system of reef, shoreline, and nearshore waters that are protected in perpetuity.		✓	
WATERSHEDS, STREAMS, AND WETLANDS ISSUES			
2.3 Healthy watersheds, streams, and riparian environments.	✓		
WILDLIFE AND NATURAL AREAS			•
2.4 Maui's natural areas and indigenous flora and fauna will be protected.		✓	
SCENIC RESOURCES			
2.5 Maui will continue to be a beautiful island steeped in coastal, mountain, open space, and historically significant views that are preserved to enrich the residents' quality of life, attract visitors, provide a connection to the past, and promote a sense of place.	✓		
CHAPTER 3 – NATURAL HAZARDS			
3.1 Maui will be disaster resilient.			✓
CHAPTER 4 – ECONOMIC DEVELOPMENT			
ECONOMIC DIVERSIFICATION			
4.1 Maui will have a balanced economy composed of a variety of industries that offer employment opportunities and well-paying jobs and a business environment that is sensitive to resident needs and the island's unique natural and cultural resources.	✓		
TOURISM			
4.2 A healthy visitor industry that provides economic well-being with stable and diverse employment opportunities.			√
AGRICULTURE			
4.3 Maui will have a diversified agricultural industry contributing to greater economic, food, and energy security and prosperity.			✓
EMERGING SECTORS			
4.4 A diverse array of emerging economic sectors.			✓
SMALL BUSINESS DEVELOPMENT			
4.5 Small businesses will play a key role in Maui's economy.		✓	

Maui Island Plan Goals, Objectives and Policies Key: DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable	DA	IA	NA
HEALTH CARE SECTOR			
4.6 Maui will have a health care industry and options that broaden career opportunities that are reliable, efficient, and provide social well-being.			✓
EDUCATION AND WORKFORCE DEVELOPMENT			
4.7 Maui will have effective education and workforce development programs and initiatives that are aligned with economic development goals.			✓
CHAPTER 5 – HOUSING			
5.1 Maui will have safe, decent, appropriate, and affordable housing for all residents developed in a way that contributes to strong neighborhoods and a thriving island community.	✓		
CHAPTER 6 – INFRASTRUCTURE AND PUBLIC FACILITES			
SOLID WASTE			
6.1 Maui will have implemented the ISWMP thereby diverting waste from its landfills, extending their capacities.		✓	
WASTEWATER			
6.2 Maui will have wastewater systems that comply with or exceed State and Federal regulations; meet levels-of-service needs; provide adequate capacity to accommodate projected demand; ensure efficient, effective, and environmentally sensitive operation; and maximize wastewater reuse where feasible.		√	
WATER			ı
6.3 Maui will have an environmentally sustainable, reliable, safe, and efficient water system.		✓	
TRANSPORTATION			•
6.4 An interconnected, efficient, and well-maintained, multimodal transportation system.		✓	
TRANSIT			
6.5 An island-wide transit system that addresses the needs of residents and visitors and contributes to healthy and livable communities.			✓
PARKS			
6.6 Maui will have a diverse range of active and passive recreational parks, wilderness areas, and other natural-resource areas linked, where feasible, by a network of greenways, bikeways, pathways, and roads that are accessible to all.		✓	
PUBLIC FACILITIES			
6.7 Maui will have adequate public facilities that meet the diverse needs of residents.			√
SCHOOLS AND LIBRARIES			
6.8 Maui will have school and library facilities that meet residents' needs and goals.		✓	

Maui Island Plan Goals, Objectives and Policies Key: DA = Directly Applicable, IA = Indirectly Applicable, NA = Not Applicable	DA	IA	NA
HEALTH CARE			
6.9 All of Maui residents will have the best possible health care to include healthy living, disease prevention, as well as acute and long-term care.			✓
ENERGY			
6.10 Maui will meet its energy needs through local sources of clean, renewable energy, and through conservation.		✓	
HARBORS AND AIRPORT			
6.11 Maui will have harbors and airports that will efficiently, dependably, and safely facilitate the movement of passengers and cargo.			✓
CHAPTER 7 – LAND USE			
AGRICULTURAL LANDS			1
7.1 Maui will have a prosperous agricultural industry and will protect agricultural lands.			✓
RURAL AREAS			
7.2 Maui will have a rural landscape and lifestyle where natural systems, cultural resources and farm lands are protected and development enhances and compliments the viability and character of rural communities.		✓	
URBAN AREAS			I.
7.3 Maui will have livable human-scale urban communities, an efficient and sustainable land use pattern, and sufficient housing and services for Maui residents.	✓		
CHAPTER 8 – DIRECTED GROWTH PLAN	,		
URBAN AND SMALL TOWN GROWTH AREA			
8.1 Maui will have well-serviced, complete, and vibrant urban communities and traditional small towns through sound planning and clearly defined development expectations.	✓		
RURAL GROWTH AREA			
8.2 Maui will maintain opportunities for agriculture and rural communities through sound planning and clearly defined development expectations.		√	
PROTECTED AREA POLICY			
8.3.a The Protected Areas in Diagrams E-1, NW-1, N-1, NE-1, S-1, SE-1, and WC-1 should be concurrently reviewed with Table 8-2 and with any proposed land uses that may result in an adverse impact on a Protected Area. The County Council and the Administration should be notified if a Protected Area may be compromised by a development proposal.			√

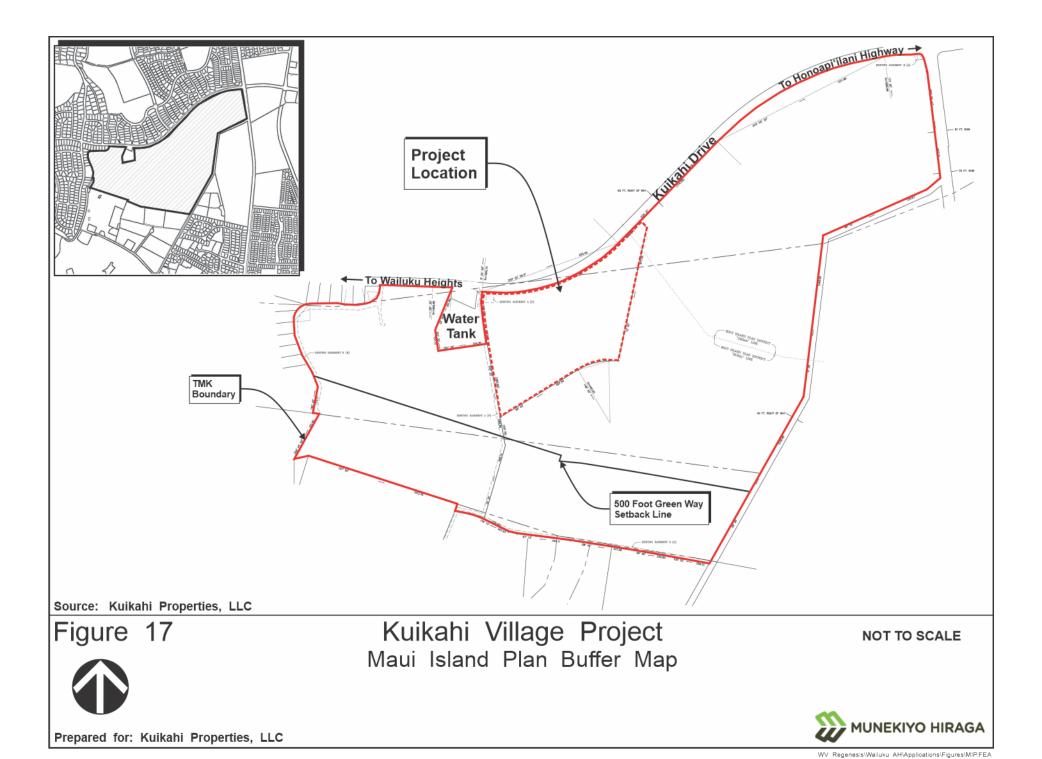
The goals, objectives, and policies of the Maui Island Plan have direct and indirect relationships with the Kuikahi Village Project. The proposed project provides additional affordable housing opportunities for Maui's residents in an area that is

close to the government, business, and commercial centers of Wailuku and Kahului. Further, the proposed project will provide for additional housing options for local families seeking to live on Maui island to be closer to their families and local employment, education, and social opportunities. The proposed project is located on fallow agricultural lands that have not been used for agricultural production in many years. As such, the proposed action is a prudent use of the land to provide much needed housing for Maui County's individuals and families.

The proposed project will generate short-term construction-related employment opportunities, as well as supporting the construction industry as a whole, including local businesses that rely on said industry. Further, the proposed action will indirectly affect the local economy, as it is anticipated that residents of the project will support small businesses nearby. The residential development also includes 16 live-work units, in which its residents are able to conduct their small-business operations through their homes. This helps these business owners save on operational costs such as storefront rent.

In addition to the various reports and studies completed for the proposed project, BMPs measures will be implemented throughout construction so as to mitigate any stormwater runoff resulting from the proposed development. Appropriate BMPs will be used during construction and applicable drainage detention measures will be provided for the long-term habitation of the site.

It is noted that the MIP identified a former planned project on Parcel 3 and a neighboring parcel, the Pu'unani project, in the Directed Growth Chapter discussion. The previously proposed project was proposed as a mixed use residential project, with Urban and Rural land uses. The MIP notes that 450 units were proposed for the Urban portions of the project site, while the dwelling unit count and proposed density in the Rural areas were to be determined. Additionally, the MIP notes that a 200-foot greenbelt from the eastern edge of the Pu'unani project's edge along Honoʻapiilani Highway was designated. Additionally, a 500-foot wide greenbelt along the Pu'unani project's southern boundary, adjacent to the Waiolani subdivision should also be provided to provide separation between Wailuku and Waikapu. The proposed Kuikahi project will comply with the 500-foot greenbelt along the southern boundary of the project site. See **Figure 17**. No development activities are proposed in this area. The project site is also located more than 200 feet away from the Honoapiʻilani Highway, and as such, the greenbelt requirement for this area will also be respected.



E. WAILUKU-KAHULUI COMMUNITY PLAN

The project site is located within the Wailuku-Kahului Community Plan region, one (1) of nine (9) community plan regions established in the County of Maui. Each region's growth and development is guided by a Community Plan. The County's Community Plan reflects current and anticipated conditions in the Wailuku-Kahului region and advances planning goals, objectives, policies, and implementation considerations to guide decision-making in the region. The primary purpose of the Community Plan is to outline a detailed agenda for carrying out these policies and objectives. The Wailuku-Kahului Community Plan was adopted by the County of Maui through Ordinance Number 3061, and became effective on June 5, 2002. The Community Plan land use map designates the project site as "Agriculture". See **Figure 18**. Pursuant to the Chapter 2.97, MCC, certain exemptions from the Wailuku-Kahului Community Plan Land use designation will be sought to enable the project to be developed, as proposed, on lands designated "Agriculture".

Though the property is designated as "Agriculture", the land has not been in agricultural cultivation use for over 15 years. Furthermore, the proposed Kuikahi Village Project makes prudent use of the project area by providing much-needed affordable housing units. The proposed development will include multiple housing types for various family sizes and will also include a minor commercial component.

The proposed project is consistent with the following goals, objectives and policies of the Wailuku-Kahului Community Plan as outlined below.

ENVIRONMENT

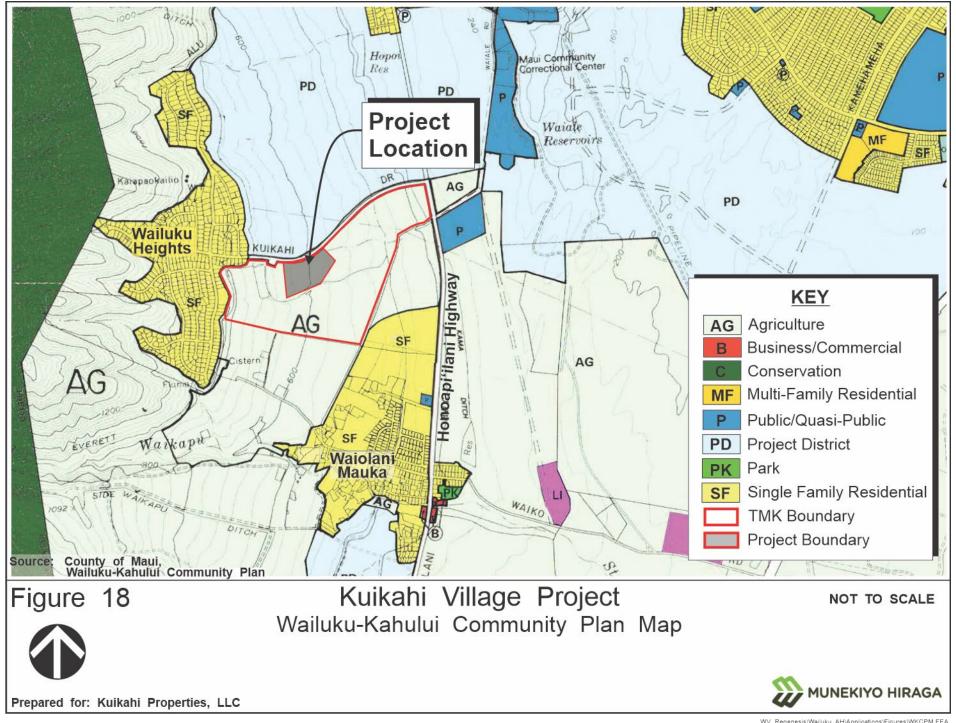
Goal:

A clean and attractive physical and natural environment in which manmade developments or alterations to the natural environment relate to sound environmental and ecological practices, and important scenic and open space resources are maintained for public use and enjoyment.

Objectives and Policies:

* * *

- 13. Support energy conservation measures, including the use of solar heating and photovoltaic systems, in conjunction with urban uses.
- 14. Promote the planting and maintenance of trees and other landscape planting to enhance the streetscapes and the built-environment.



CULTURAL RESOURCES

Goal:

Identification, protection, preservation, enhancement, and where appropriate, use of cultural practices and sites, historic sites and structures, and cultural landscapes and view planes that:

- 1. Provide a sense of history and define a sense of place for the Wailuku-Kahului region; and
- 2. Preserve and protect native Hawaiian rights and practices customarily and traditionally exercised for subsistence, cultural and religious purposes in accordance with Article XII, Section 7, of the Hawaii State Constitution, and the Hawaii Supreme Court's PASH opinion, 79 HAW. 425 (1995).

Objectives and Policies:

* * *

5. Require development projects to identify all cultural resources located within the project area as part of initial project studies. Further, require that all proposed activity include recommendations to mitigate potential adverse impacts on cultural resources.

Implementing Actions:

* * *

2. Require development projects to identify all cultural resources located within or adjacent to the project area and consult with individuals knowledgeable about such cultural resources prior to application as part of the County development review process. Further, require that all proposed activity include recommendations to mitigate potential adverse impacts on cultural resources including site avoidance, adequate buffer areas, and interpretation. Particular attention should be directed toward dune areas, known and probable precontact habitation areas, and other sites and areas listed in No. 5 below, with review by the Cultural Resources Commission, where appropriate.

HOUSING

Goal:

A sufficient supply and choice of attractive, sanitary and affordable housing accommodations for the broad cross section of residents, including the elderly.

Objectives and Policies

* * *

2. Provide sufficient land areas for new residential growth which relax constraints on the housing market and afford variety in type, price, and location of units. Opportunities for the provision of housing are presently constrained by a lack of expansion areas. This condition should be relieved by a choice of housing in a variety of locations, both rural and urban in character.

* * *

6. Coordinate the planning, design and construction of public infrastructure improvements with major residential projects that have an affordable housing component.

* * *

8. Promote efficient housing designs in order to reduce residential home energy and water consumption.

SOCIAL INFRASTRUCTURE

Goal:

Develop and maintain an efficient and responsive system of public services which promotes a safe, healthy and enjoyable lifestyle, accommodates the needs of young, elderly, disabled and disadvantaged persons, and offers opportunities for self-improvement and community well-being.

Recreation

Objectives and Policies

1. Provide park and recreation areas as an integral part of project district specifications which will accommodate the needs of population growth.

* * *

16. Ensure that adequate regional/community park facilities are provided to service new residential developments.

Education

Implementing Actions

1. Where possible during the zoning process, ensure that applicants contribute to the development, funding, and/or construction of school facilities on a fair-share basis as determined by and to the satisfaction of the State Department of Education. Terms of the contribution shall be

agreed upon by the applicant and the State Department of Education prior to the applicant applying for building permits.

LAND USE

Goal:

An attractive, well-planned community with a mixture of compatible land uses in appropriate areas to accommodate the future needs of residents and visitors in a manner that provides for the social and economic well-being of residents and the preservation and enhancement of the region's environmental resources and traditional towns and villages.

* * *

14. Maintain physical separation between traditional towns and villages in the region. Where possible, provide specific design or landscape elements, such as open space buffers or changes in streetscape, to clearly delineate the boundary between Kahului and Wailuku. Maintain open space around traditional rural areas, such as Waikapu and Waihe'e, to provide a sense of community and to prevent envelopment of these areas by urban expansion.

* * *

15. Provide a substantial greenway or greenbelt to serve as a buffer zone, line of demarcation, or definition between Wailuku and Waikapu, and between Waikapu and Ma'alaea, in order to prevent the continuation of urban sprawl. Changes in streetscapes could include landscaping and agricultural planting materials that reflect the character of each community, and are utilized to delineate a substantial boundary between Kahului and Wailuku.

INFRASTRUCTURE

Goal:

Timely and environmentally sound planning, development and maintenance of infrastructure systems which serve to protect and preserve the safety and health of the region's residents, commuters and visitors through the provision of clean water, effective waste disposal and drainage systems, and efficient transportation systems which meet the needs of the community.

LIQUID AND SOLID WASTE

Objectives and Policies:

1. Coordinate sewer system improvement plans with future growth requirements, as defined in the Community Plan.

DRAINAGE

Objective and Policies:

4. Ensure that storm water run-off and siltation from proposed development will not adversely affect the marine environment and nearshore and offshore water quality. Minimize the increase in discharge of storm water runoff to coastal waters by preserving flood storage capacity in low-lying areas, and encouraging infiltration of runoff.

ENERGY

Objectives and Policies:

6. Encourage energy efficient building design and site development practices.

TRANSPORTATION

Objectives and Policies:

 Provide bikeway and walkway systems in the Wailuku-Kahului area which offer safe and pleasant means of access, particularly along routes accessing esidential districts, major community facilities and activity centers, school sites, and the shoreline between Kahului Harbor and Pa'ia.

Discussion and Response:

As previously mentioned, the proposed Kuikahi Village Project will provide 202 residential units varying in type (i.e., multi-family/condominium, duplex, townhome, live-work, studio, single-family) to accommodate for different family sizes. These residences will be affordable for families and individuals, with units for for sale. Parking for residents and visitors, as well as "spot parks", a playground, pavilion, and a bicycle/pedestrian trail are among the amenities to be provided at the proposed development. The project site is centrally located, near existing residential and commercial developments in both Wailuku and Waikapū. The location is ideal for an affordable housing project, given the proximity to commercial and social services, such as grocery stores, local small-businesses, schools, and government facilities. Furthermore, the project will include a minor commercial component, in which residents living in the live-work units may use the space to operate their own small-businesses at an affordable price.

F. COUNTY ZONING

The project site is identified "Agricultural" on the digital zoning maps adopted by the County of Maui through Ordinance No. 4883 effective on October 6, 2018. While the

current zoning does not allow for the proposed residential uses, an application pursuant to Chapter 2.97, MCC, has been prepared for submittal to the County of Maui. Included in the filing will be a request to exempt the proposed project from certain provisions of the MCC which will allow the proposed project to be developed as proposed and exempt from County zoning provisions and the development standards of the "Agricultural" district. See **Figure 19**. These exemptions are further described in Chapter IV of this document.

G. HAWAI'I COASTAL ZONE MANAGEMENT PROGRAM

The Hawai'i Coastal Zone Management Program (HCZMP), as formalized in Chapter 205A, HRS, establishes objectives and policies for the preservation, protection, and restoration of natural resources of Hawai'i's coastal zone. Although the subject property is not within the County of Maui's Special Management Area (SMA), the applicability of coastal zone management considerations applies to all lands in the State of Hawai'i and, as such, has been reviewed and assessed as follows.

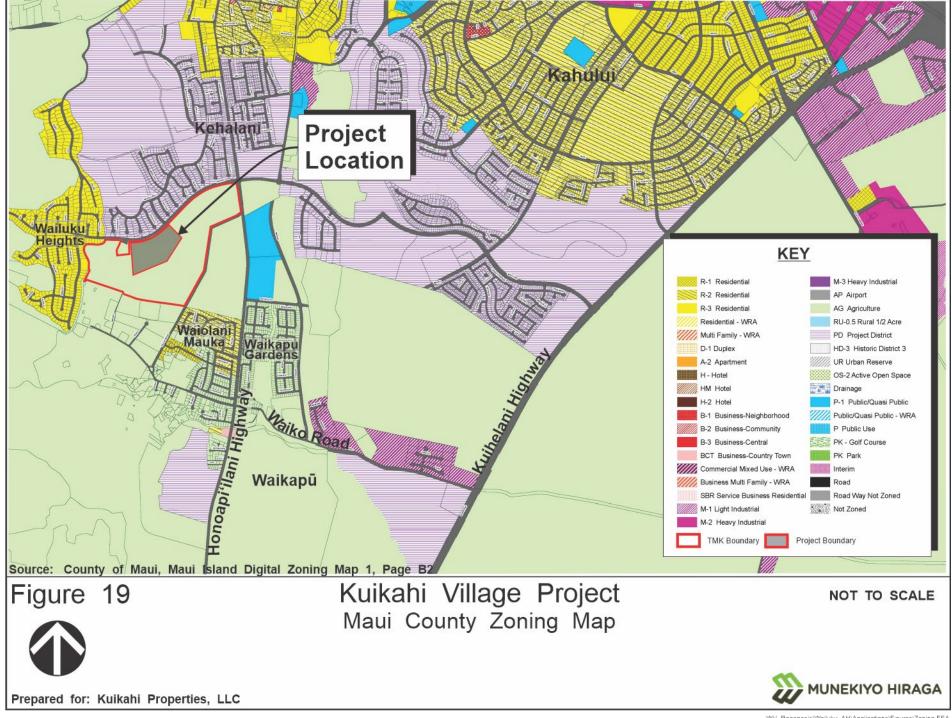
1. Recreational Resources

Objective:

Provide coastal recreational opportunities accessible to the public.

Policies:

- a. Improve coordination and funding of coastal recreational planning and management; and
- b. Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:
 - i. Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas:
 - ii. Requiring restoration of coastal resources that have recreational and ecosystem value including, but not limited to coral reefs, surfing sites, fishponds, sand beaches, and coastal dunes when these resources will be unavoidably damaged by development; or requiring monetary compensation to the State for recreation when restoration is not feasible or desirable:
 - iii. Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value:
 - iv. Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;



- v. Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources:
- vi. Adopting water quality standards and regulating point and nonpoint sources of pollution to protect, and where feasible, restore the recreational value of coastal waters;
- vii. Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and
- viii. Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting such dedication against the requirements of section 46-6.

Response: The project site is located inland and away from the coastline. The proposed action is not expected to impact coastal recreational opportunities or affect existing public access to and along the shoreline.

2. <u>Historic/Cultural Resources</u>

Objective:

Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies:

- a. Identify and analyze significant archaeological resources;
- b. Maximize information retention through preservation of remains and artifacts or salvage operations; and
- c. Support state goals for protection, restoration, interpretation, and display of historic resources.

Response: Archaeological consultation with SHPD and a CIA were carried out for the proposed project. Refer to **Appendix "D-2"** and **Appendix "E"**, respectively. The Applicant will comply with recommendations and reqruiements by the SHPD for project implementation.

3. Scenic and Open Space Resources

Objective:

Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

- a. Identify valued scenic resources in the coastal zone management area;
- b. Ensure that new developments are compatible with their visual environment by designing and locating those developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;
- c. Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and
- d. Encourage those developments that are not coastal dependent to locate in inland areas.

Response: As indicated previously, the project is not located on or near the shoreline and represents an affordable housing project in an area surrounded by urban development. As such, the proposed project will not adversely impact coastal scenic and open space resources.

4. Coastal Ecosystems

Objective:

Protect valuable coastal ecosystems, including reefs, beaches and coastal dunes from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

- a. Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;
- b. Improve the technical basis for natural resource management;
- c. Preserve valuable coastal ecosystems of significant biological or economic importance, including reefs, beaches, and dunes;
- d. Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and

e. Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.

Response: The proposed project is located inland, away from coastal ecosystems and is, therefore, not anticipated to have adverse impacts on coastal/shoreline resources, including reefs and marine resources. The proposed project does not include any stream diversions or channelization. Appropriate Best Management Practices (BMPs) will be utilized to ensure that construction runoff is appropriately retained, minimizing any impact on coastal waters.

5. <u>Economic Use</u>

Objective:

Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

- a. Concentrate coastal dependent development in appropriate areas;
- b. Ensure that coastal dependent development and coastal related development are located, designed, and constructed to minimize exposure to coastal hazards and adverse social, visual, and environmental impacts in the coastal zone management area; and
- c. Direct the location and expansion of coastal development to areas designated and used for that development and permit reasonable long-term growth at those areas, and permit coastal development outside of designated areas when:
 - i. Use of designated locations is not feasible;
 - ii. Adverse environmental effects and risks from coastal hazards are minimized; and
 - iii. The development is important to the State's economy.

Response: The proposed project is not a coastal dependent development. The project site is located inland from the shoreline. The proposed project will stimulate the economy through the generation of short-term construction jobs. The proposed project does not contravene the objective and policies for economic use.

6. Coastal Hazards

Objective:

Reduce hazard to life and property from coastal hazards.

Policies:

- a. Develop and communicate adequate information about the risk of coastal hazards;
- b. Control development, including planning and zoning control, in areas subject to coastal hazards;
- c. Ensure that developments comply with requirements of the National Flood Insurance Program; and
- d. Prevent coastal flooding from inland projects.

Response: As previously mentioned, the proposed project is located within Flood Zone X of the Federal Emergency Management Agency's Flood Insurance Rate Map and the project area does not experience any significant local flooding problems. The project will be located inland and is outside any tsunami evacuation areas and sea level rise exposure areas. As such, the proposed project does not contravene the objective and policies for coastal hazards.

7. <u>Managing Development</u>

Objective:

Improve the development review process, communication, and public participation in the management of coastal resources and hazards.

Policies:

- a. Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;
- b. Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements; and
- c. Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.

Response: Opportunities for agency and public review of the proposed action are provided pursuant to Chapter 343, HRS. Additionally, as previously noted, the Applicant plans to submit an application related to MCC, Chapter 2.97 for

affordable housing to the Maui County Council for review and approval. Said application will also undergo public review. The Applicant has, and will continue to engage the public through the project planning and design processes. Meetings were conducted with various stakeholders including the Waikapu Community Association, the Kehalani Community Association Board, the Wailuku Heights Association and the Aha Moku 'O Wailuku. Consultation has also occurred through the CIA process in which native Hawaiian organizations, agencies, and community members were contacted. Refer to **Appendix "E"**.

8. Public Participation

Objective:

Stimulate public awareness, education, and participation in coastal management.

Policies:

- a. Promote public involvement in coastal zone management processes;
- b. Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities; and
- c. Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

Response: Opportunities for agency and public review of the proposed action are provided through the comment processes pursuant to Chapter 343, HRS and MCC, Chapter 2.97 application process. The Applicant also held meetings with various stakeholders including the Waikapu Community Association, the Kehalani Association, the Wailuku Heights Association and the Aha Moku 'O Wailuku. Consultation has also occurred through the CIA process. Refer to **Appendix "E"**.

9. Beach and Coastal Dune Protection

Objectives:

- A. Protect beaches and coastal dunes for:
 - (i) Public use and recreation;
 - (ii) The benefit of coastal ecosystem; and
 - (iii) Use as natural buffers against coastal hazards; and
- B. Coordinate and fund beach management and protection.

Policies:

- a. Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion;
- b. Prohibit construction of private shoreline hardening structures, including seawalls and reventments, at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;
- c. Minimize the construction of public shoreline hardening structures, including seawalls and revetments at sites having sand beaches and at sites where shoreline hardening structures interfere with existing recreational and waterline activities;
- d. Minimize grading of and damage to coastal dunes;
- e. Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor; and
- f. Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.

Response: The project site is located inland, away from the shoreline and is not anticipated to impact shoreline processes.

10. Marine and Coastal Resources

Objective:

Promote the protection, use, and development of marine and coastal resources to assure their sustainability.

Policies:

- a. Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;
- b. Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;
- c. Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone;
- d. Promote research, study, and understanding of ocean and coastal processes, impacts of climate change and sea level rise, marine

life, and other ocean resources to acquire and inventory information necessary to understand how coastal development activities relate to and impact ocean and coastal resources; and

e. Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources..

Response: The project is located inland, away from the ocean and is, therefore, not anticipated to have an impact on marine resources.

REQUESTED EXEMPTIONS PURSUANT TO CHAPTER 2.97, MCC



IV. REQUESTED EXEMPTIONS PURSUANT TO CHAPTER 2.97, MCC

A. INTRODUCTION

The purpose of Maui County Code (MCC) Chapter 2.97, "Residential Workforce Housing Policy Incentives and Exemptions" is to establish a process by which developers of 100 percent residential workforce housing projects may seek fast track development of their projects by applying for County exemptions from this code. This process allows developers to seek exemptions from MCC including, but not limited to Title 19, MCC relating to zoning; Title 18, MCC relating to subdivision requirements; Chapter 2.80B, MCC relating to general plan and community plans; and Chapter 19.68, MCC relating to State land use district boundary amendments for projects less than 15 acres in the "Agricultural" district, provided that the project still meets the minimum requirements for health and safety.

The Kuikahi Village Project will be a 202-unit affordable for sale project offered to residents earning between 60 percent and 140 percent of the Area Median Income (AMI). Most of Maui County's current projects in the development pipeline are affordable or workforce for-sale homes. The proposed project intends to serve the demand for affordable housing in the Central Maui area and offers a variety of housing types for families and individuals. In response to this increasing affordable housing demand pressure and high cost of construction, Chapter 2.97, MCC exemptions are sought.

The exemption requests which follow are necessary to achieve and maintain the financial feasibility of the project and thereby reduce the per unit cost of the project. If the proposed exemptions are granted, Kuikahi Properties, LLC will be able to offer 202 residential units, affordable to qualified households earning between 60 percent and 140 percent of the AMI.

B. EXEMPTIONS TO BE REQUESTED

This Environmental Assessment (EA) has been prepared to support the Applicant's Chapter 2.97, MCC application for submittal to the County of Maui, Department of Housing and Human Services (DHHC). Included in the Chapter 2.97, MCC filing will be a request to exempt the proposed project from certain provisions of the MCC which will allow the proposed project to be developed for senior affordable rental housing. It is noted that the list of exemptions is preliminary and subject to approval by the Maui County Council. Exemptions may be further modified as part of the Chapter 2.97 review and approval process. The proposed current exemptions are summarized below in **Table 9**.

 Table 9. Proposed Kuikahi Village Project Chapter 2.97 Exemption Requests

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
1.	Requirements for bond funding to ensure project construction completion.	Title 2 – Administration and Personnel Chapter 2.97 - Residential Workforce Housing Policy Incentives and Exemptions Section 160 Timing of Completion	MCC 2.97.160 – Timing of Completion. Clarification is requested to state that the form of bonding to ensure that construction is completed will be in the form of a material house bond.	Exemption will provide Applicant flexibility in providing the bond funding to ensure completion of construction. Applicant will provide a bond for the project.
2.	Requirement for Community Plan Amendment to allow for Single- Family, Multi- Family, Business/Multi- Family and Park Uses	Title 2 – Administration and Personnel Chapter 2.97 - Residential Workforce Housing Policy Incentives and Exemptions Section 120, Exemptions Chapter 2.80B - General Plan and Community Plans	MCC 2.97.120 - Exemptions. Chapter 2.80B, General Plan and Community Plans. Per County Code 2.97.120, an exemption from Chapter 2.80B, MCC, General Plan and Community Plans, shall be granted to permit the project to proceed without obtaining a community plan amendment. The project site is designated as "Agricultural" in the Wailuku-Kahului Community Plan Map. The exemption will allow the project to proceed with the "Single Family", Multi-Family", "Business/Multi-Family", and "Park" uses as proposed.	The project site is currently designated "Agriculture" by the Wailuku-Kahului Community Plan. The exemption from the Community Plan Amendment requirement will allow for expedited process to allow for affordable workforce housing in Central Maui.
3.	Requirement for Compliance with Residential Workforce Housing Policy – Housing Credits	Title 2 – Administration and Personnel Chapter 2.96 - Residential Workforce Housing Policy Section 050 - Residential Workforce Housing Credits	MCC 2.96.050 - Residential Workforce Housing Credits. An exemption from MCC 2.96.050, Residential Workforce Housing Credits, is requested to allow 100% of the units to qualify for workforce housing credits.	The proposed exemption will provide the Applicant the ability to receive affordable housing credits for all units within the project. The Applicant will be able to market the housing credits to raise funds for future affordable housing projects.

	nent Standard quirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
rec req dis and fee dis	quirement for ceipt of quired posal permit d payment of es related to posal of nstruction ste	Title 8 – Health and Safety Chapter 8.04 – Refuse Collection and Landfills Sections: 040 – Disposal Permits- Application and Suspension. 050 – Disposal Charges.	MCC 8.04.040 - Disposal Permits – Application and Suspension. MCC 8.04.050 - Disposal Charges. An exemption from MCC 8.04.040, and 050, Refuse Collection and Landfills is requested to exempt the project from obtaining a construction waste disposal permit and paying disposal fees during construction.	An exemption from the requirements to apply for a disposal permit and pay associated charges will provide cost savings and ensure that the project is financially feasible.
fee Driv	quirement for es related to veway rmits	Title 2 – Administration and Personnel Chapter 2.97 Residential Workforce Housing Policy Incentives and Exemptions Section 150 – Fee Waiver. Title 12 – Streets, Sidewalks, and Public Places Chapter 12.08 – Driveways Section 050 – Permit-Fee.	MCC 2.97.150 - Fee Waiver. MCC 12.08.050 - Permit-Fee. Per County Code 2.97.150, an exemption from MCC 12.08.050 - Permit Fee, is requested that no fees will be required for the approval and construction of the driveways.	An exemption from the requirements to pay associated charges for driveway permits will provide cost savings and ensure that the project is financially feasible.

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
6.	Requirement for fees related to permits for work in the County Right-of-Way	Title 2 – Administration and Personnel Chapter 2.97 Residential Workforce Housing Policy Incentives and Exemptions Section 120 – Exemptions. Title 12 – Streets, Sidewalks, and Public Places Chapter 12.04 – Street and Highway Excavations Section 025 – Permit fee.	MCC 12.04.025 - Permit Fee. Per County Code 2.97.120, an exemption from MCC 12.04.025 - Permit Fee, is requested that no fees will be required for the approval of a County highways permit to construct improvements and install off-site utilities on Kuʻikahi Drive.	An exemption from the requirements to pay associated charges for work on County roadway will provide cost savings and ensure that the project is financially feasible.
7.	Requirement to provide landscaping as specified by the County	Title 12 – Streets, Sidewalks, and Public Places Chapter 12.24A Landscape Planting and Beautification	MCC 12.24A – Landscape Planting and Beautification If necessary to provide flexibility, an exemption from MCC 12.24A, Landscape Planting and Beautification, is requested to exempt the project from standard landscaping requirements. Landscaping will be in accordance with the Conceptual Landscape Plan. See Exhibit "1".	An exemption from the requirement to provide landscaping as specified by the section of the code is requested to provide the Applicant some flexibility in the landscaping provided for the project. This may also provide cost savings for the project.
8.	Requirement to provide landscaping as specified by the County	Title 12 – Streets, Sidewalks, and Public Places Chapter 12.24A Landscape Planting and Beautification Section 070D – Street Trees. Subdivisions.	MCC 12.24A.070D – Street Trees. Subdivisions. Planting of Street Trees, shall be granted to allow flexibility in the number, species, and location of street trees in the Kuikahi Village project. The Conceptual Landscape Plan prepared by a licensed landscape architect, attached here as Exhibit "1", shall be reviewed by the Department of Public Works prior to approval.	An exemption from the requirement to provide landscaping as specified by the section of the code is requested to provide the Applicant some flexibility in the landscaping provided for the project. This may also provide cost savings for the project.

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
9.	Requirement for payment of Water System Development fees	Title 14 – Public Services Chapter 14.07 – Water system Development Fees Section 030 – Water System Development Fee Schedule	MCC 14.07.030 – Water System Development Fee Schedule. An exemption from MCC Chapter 14.07.030, Water System Development Fees, is requested to exempt the project from water system development fees.	An exemption from the requirements to pay the water system development fees will advance the affordability objectives of the project.
10.	Requirement for payment of Temporary Water Meter fees	Title 14 – Public Services Chapter 14.10 – Water Rates and Fees Section 040 – Temporary Meter Charges and Water Use Restrictions	MCC 14.10.040 – Temporary Meter Charges. An exemption from MCC Chapter 14.10.040, Temporary Meter Charges, to waive the fees for a temporary construction water meter for the project and from the restrictions on water use of temporary meter during construction of the project.	An exemption from the requirements to pay the temporary water meter fees during construction will advance the affordability objectives of the project.
11.	Requirement for payment of Wastewater Assessment Fees	Title 2 – Administration and Personnel Chapter 2.97 Residential Workforce Housing Policy Incentives and Exemptions Section 150 – Fee Waiver. Title 14 – Public Services Chapter 14.35 – Wastewater Assessment Fees For Facility Expansion For The Wailuku/Kahului Wastewater Treatment System Section 080 – Exemptions.	MCC 14.35.080 – Exemptions. Per MCC 2.97.150, an exemption from MCC 14.35.080, Wastewater Assessment Fees for Facility Expansion for the Wailuku/Kahului regional Wastewater Treatment System.	An exemption from the requirements to pay the Wailuku/Kahului Assessment fees for the expansion of the Wailuku/Kahului Wastewater Treatment system will advance the affordability objectives of the project.

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
12.	Requirement for payment of Traffic Impact Fees for Wailuku-Kahului Fees	Title 2 – Administration and Personnel Chapter 2.97 Residential Workforce Housing Policy Incentives and Exemptions Section 150 – Fee Waiver. Title 14 – Public Services Chapter 14.76 - Impact Fees For Traffic And Roadway Improvements In Wailuku-Kahului, Maui, Hawaii Section 120 – Exemptions and Credits.	MCC 14.76.120 – Exemptions and Credits. Per MCC 2.97.150, an exemption from MCC 14.76.120, Impact fees for traffic and roadway improvements in Wailuku-Kahului, Maui, Hawai'i.	An exemption from the requirements to pay the Wailuku-Kahului Traffic Impact assessment fees for road improvements will advance the affordability objectives of the project.
13.	Requirement for payment of permit and inspection fees	Title 2 – Administration and Personnel Chapter 2.97 Residential Workforce Housing Policy Incentives and Exemptions Section 150 – Fee Waiver. Title 16, Buildings and Construction, MCC: Sections 16.04C, Fire Code 16.18B, Electrical Code 16.20B, Plumbing Code 16.26B, Building Code	MCC Title 16 - Building and Construction Exemptions from MCC Chapters: • 16.04C, Fire Code, • 16.18B, Electrical Code, • 16.20B, Plumbing Code, and • 16.26B, Building Code Per Maui County Code 2.97.150, exemptions from MCC 16.04C Fire Code; 16.18B Electrical Code; 16.20B Plumbing Code; and 16.26B Building Code, is requested to exempt the project from Fire, Electrical, Plumbing, and Building Permit fees, as well as plan review and inspection fees.	These exemptions provide savings to ensure the project is financially feasible. The project intends to meet all inspection and code requirements.

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
14.	Requirement for payment of permit and inspection fees	Title 16 – Building and Construction Chapter 16.26B – Building Code Section 108.2.1 – Schedule of Permit Fees.	MCC 16.26B.108.2.1 – Schedule of Permit Fees. An exemption from MCC 16.26B.108.2.1 Plan Review Fees and Fund, is requested to request exemption for project permits from Plan Review fees and any resubmittal review fees.	These exemptions provide savings to ensure the project is financially feasible. The project intends to meet all inspection and code requirements.
15.	Urban standards, relating to curb, gutter, and sidewalks	Title 16 – Building and Construction Chapter 16.26B – Building Code Section 3600 – Chapter 36 Added. Improvements to Public Streets	MCC 16.26B.3600 – Chapter 36 Added. Improvements to Public Streets. An exemption from MCC 16.26B.3600, Improvements to Public Streets, is requested that the project will not be required to make improvements pertaining to the undergrounding of overhead utility lines, road widening, or other improvements including, but not limited to curbs, gutters, and sidewalks along Ku'ikahi Drive for the entire parcel.	This exemption will allow the Applicant to implement the project without providing improvements to public streets and ensuring the project is financially feasible. The Applicant will provide a shared bike/pedestrian path on their property, along the project's frontage to Ku'ikahi Drive.
16.	Requirements for Change of Zoning, Community Plan Amendment and roadway design standards	Title 18 – Subdivisions Chapter 18.04 – General Provisions Chapter 18.16 – Design Standards Section 020 – Compliance.	MCC 18.16.020 – Design Standards. An exemption from MCC 18.04 General Provisions and 18.16.020 Design Standards, is requested as related to land use consistency and conformity requirements of Title 18, and any requirement to obtain a change in zoning and/or community plan amendment and also allow for flexible design standards for the proposed roundabout on Kuʻikahi Drive at the Kehalani Mauka Parkway intersection to enable subdivision approval.	This exemption will allow the Applicant to implement the project without the Change of Zoning and Community Plan Amendment while ensuring the project is financially feasible. The exemption will also allow the Applicant flexibility in the design of the proposed roundabout at the intersection of Kehalani Mauka Parkway and Kuʻikahi Drive, to the satisfaction of the Department of Public Works.

	lopment Standard r Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
17.	Requirement for payment of Park Assessment fee	Title 2 – Administration and Personnel Chapter 2.97 Residential Workforce Housing Policy Incentives and Exemptions Section 150 – Fee Waiver. Title 18 – Subdivisions Chapter 18.16 – Design Standards Section 320 – Parks and Playgrounds.	MCC 18.16.320 – Parks and Playgrounds. Per County Code, 2.97.150, an exemption from MCC 18.16.320 Parks and Playgrounds, is requested to exempt the project from park assessment fees.	This exemption provides savings to ensure the project is financially feasible. The project will provide a playground with covered pavilion, five (5) spot parks and a shared bike/pedestrian pathway within the project and along the project frontage with Ku'ikahi Drive. The parks will be privately owned and maintained.
18.	Requirement for minimum right- of-way widths for roadways	Title 18 – Subdivisions Chapter 18.16 – Design Standards Sections: 050 – Minimum Right-of-Way and Pavement Widths. 060 – Widening of Existing Rights-of-Way.	MCC 18.16.050 - Minimum Right-of-Way and Pavement Widths. MCC 18.16.060 - Widening of Existing Rights-of-Way. An exemption from MCC 18.16.050, minimum right-of-way and pavement widths, and 18.16.060 widening of existing rights-of-way is requested for project's internal roadways. The Project's internal roadways are proposed to have a 20 foot wide right of way.	This exemption will allow the Applicant to implement the project by providing narrower road widths within the project and ensuring the project is financially feasible. The Applicant does not plan to dedicate the internal project roads to the County in the future.
19.	Requirement for Land Use consistency for subdivision of property	Title 18 – Subdivisions Chapter 18.04 – General Provisions Section 030 – Administration	MCC 18.04.030 – Administration. An exemption from Section 18.04.030, MCC, Administration, and related land use consistency and conformity requirements of Title 18, shall be granted to exempt the project from obtaining a change in zoning and/or community plan amendment to enable subdivision approval and for the project to be developed to the standards outlined in this exemption list.	This exemption would expedite the delivery of affordable workforce housing. The project area is located within the Rural and Urban Growth boundaries and respects the setbacks set in the Maui Island Plan for the previously planned project (Pu'unani Project).

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
20.	Urban standards, relating to sidewalks	Title 18 – Subdivisions Chapter 18.20 – Improvements Section 070 – Sidewalks.	MCC 18.20.070 – Sidewalks. An exemption from MCC 18.20.070 is requested to not require the Applicant to construct a sidewalk along Kuʻikahi Drive. An exemption from Section 18.20.070 MCC, Sidewalks, shall be granted to allow the following sidewalk standards within the project: • Three (3) feet wide, with no curb and gutter	This exemption will allow the Applicant to implement the project without providing improvements to public streets and ensuring the project is financially feasible. The Applicant will provide a shared bike/pedestrian path on their property, along the project's frontage to Kuʻikahi Drive.
21.	Urban standards, relating to curbs and gutter	Title 18 – Subdivisions Chapter 18.20 – Improvements Section 080 – Curbs and Gutters.	MCC 18.20.080 – Curbs and Gutters An exemption from Section 18.20.080 MCC, Curbs and Gutters, shall be granted to allow grass swales within the Project.	This exemption will allow the Applicant to implement the project without providing improvements to interior streets and ensuring the project is financially feasible. The Applicant will provide grass swales along the interior project roads.
22.	Requirement to provide improvements for subdivision	Title 14 - Public Services Title 16 - Building and Construction Title 18 - Subdivisions Title 19.30A - Agricultural Zoning	An exemption is requested from the requirements of Title 14, Title 16, Title 18 and Section 19.30A of the Maui County Code to authorize the Director of Public Works to defer various subdivision requirements, limitations or both, to approve the subdivision application for the parcel identified at TMK (2) 3-5-002:003, are approximately 148.01 acres, to create the14.950 acre for the Project (the "Project Site"). The subject subdivision will result in two (2) lots, (a) the 14.950 acre Project Site; and (b) a 133.06 acre lot. The 133.06 acre lot and the Project Site will be subject to the provisions of Title 14,Title 16, Title 18, and Section 19.30A, MCC, upon application for further subdivision or building permit, whichever occurs first, with the understanding that certain exemptions are being requested for the Project Site as part of this Chapter 2.97, MCC, application.	This exemption will allow for the proposed project to proceed, without the requirement to provide standard subdivision improvements to the entire Tax Map Key parcel. This exemption will expedite the delivery of affordable workforce housing. Any future development of additional lands within the Tax Map Key parcel would undergo separate review and compliance with requirements.

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
23.	Requirement of payment of building permit resubmittal fee	Title 19 – Zoning Article II. – Comprehensive Zoning Provisions Chapter 19.04 – General Provisions and Definitions Section 050 – Fees Article V. – Administration and Enforcement Chapter 19.510 – Application and Procedures Section 010.B – General Application Procedures. Fees	MCC 19.04.050 – Fees. MCC 19.510.010B – General Application Procedures. Fees. An exemption from Section 19.04.050, MCC, Fees and Section 19.510.010B., Application and Procedures is requested to exempt the project from any building permit resubmittal fees.	The proposed exemption will allow the project plans to be reviewed without the payment of resubmittal fees during building permit review. This will provide cost savings for the Applicant to support the goal of providing affordable workforce housing.
24.	Requirements of Change of Zoning and all provisions related to "Agricultural" development standards to allow for the Residential and Park design standards	Title 19 – Zoning Article II. – Comprehensive Zoning Provisions Chapter 19.30A – Agricultural District	MCC 19.30A – Agricultural District An exemption from 19.30A.Agricultural District, MCC, Permitted Uses, shall be granted to allow the following principal uses: 1) single-family units; and 2) accessory structures such as carports and private garages; parking areas; energy systems, small-scale; fences and walls; storage sheds; and park recreational buildings and structures, including but not limited to gazebo, pavilions, courts, and playgrounds. Further, this exemption shall allow the use of the property in the conceptual plat configuration shown in Exhibit "2", which may be amended by the Director of Public Works. The following zoning standards shall apply to the proposed development. Residential Use: Minimum lot area: Approximately 4,600 square feet for single-family residences	The project site is zoned "Agricultural". These exemptions would expedite the delivery of affordable workforce housing by allowing the project to be developed with the Residential and Park development standards noted which are more applicable to the project, without the need to obtain a Change of Zoning.

	opment Standard Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
			Height: No building shall exceed three-stories or 40 feet in height, measured from finished grade Setback: For single-story buildings:	
25.	Requirements of Change of Zoning and all provisions related to "Agricultural" development standards to allow for design standards	Title 19 – Zoning Article II. – Comprehensive Zoning Provisions Chapter 19.30A – Agricultural District Section 030 – District Standards.	MCC 19.30A.030 – District Standards. An exemption from 19.30A.030, District Standards, shall be granted to allow for the use of walls with a maximum height of eight (8) feet for the project including retaining walls which may be needed for site utilization.	The proposed exemption would provide for expedited development of residential work force housing through the allowance of the use of retaining walls with a maximum height of eight (8) feet. This provision will ensure the project is financially feasible.

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
26.	Requirements of heights limits for structures	Title 19 – Zoning Article II. – Comprehensive Zoning Provisions Chapter 19.30.A – Agricultural District Section 030 – District Standards.	MCC 19.30.050 – Development Standards. An exemption from Section 19.30.A.030, MCC, Development Standards, to allow a maximum height of three-stories not to exceed 40 feet, as measured from finished grade.	An exemption from the height requirements will allow for the multi-family units to be constructed for the project. This will support the delivery of affordable housing units.
27.	Requirement to provide landscaping as specified by the County	Title 19 – Zoning Article II. – Comprehensive Zoning Provisions Chapter 19.36B – Off-Street Parking and Loading Section 080 – Landscaping.	MCC 19.36B.080 – Landscaping An exemption from Section 19.36B.080, MCC, Landscaping, to allow for flexibility in the location of landscaping, which requires one (1) shade tree at minimum regular intervals for every five (5) spaces. The project shall comply with Section 19.36 B.080 in effect at the time of the filing of the MCC Chapter 2.97 application, and that the project shall not be subject to any amendments to Section 19.36 B.080 adopted prior to the issuance of building permits for the project until construction is completed. Refer to Exhibit "1".	An exemption from the requirement to provide landscaping as specified by the section of the code is requested to provide the Applicant some flexibility in the landscaping provided for the project. This may also provide cost savings for the project.

	elopment Standard or Requirement	Relevant Section/ Requirement	Requested Exemption	Rationale for Request
28.	Requirement for State Land Use District Boundary Amendment for project	Title 2 – Administration and Personnel Chapter 2.97 Residential Workforce Housing Policy Incentives and Exemptions Section 120 – Exemptions. Title 19 – Zoning Chapter 19.68 – State Land Use District Boundaries Chapter 19.510 – Application and Procedures Article 8. – Chapter 8, Revised Charter of the County of Maui (1983), as amended.	MCC 19.68 – State Land Use District Boundaries. MCC 19.510 – Application and Procedures Article 8. – Chapter 8, Revised Charter of the County of Maui (1983), as amended. Per County Code 2.97.120, an exemption from Chapter 19.68, MCC, State Land Use District Boundaries; Chapter 19.510, MCC, Application and Procedures; Article 8, Chapter 8, Revised Charter of the County of Maui (1983), as amended. Exemptions are granted from Chapters 19.68 and 19.510, MCC, and Article 8, Chapter 8, of the Revised Charter of the County of Maui (1983), as amended, to enable the District Boundary Amendment request to proceed directly to the Maui County Council. The District Boundary Amendment request will not require the preparation of a District Boundary Amendment application and will not require processing through the Maui Planning Commission.	The project site is 14.9 acres and is located within the "Agricultural" District. This exemption will expedite the delivery of affordable workforce housing.
29.	Requirement for payment of permit and inspection fees.	Title 20 – Environmental Protection Chapter 20.08 – Soil Erosion and Sedimentation Control Section 090 – Grubbing and Grading Permit Fees.	MCC 20.08.090 - Grubbing and Grading Permit Fees. An exemption from Section 20.08.090, MCC, Grubbing and Grading Permit Fees, shall be granted to exempt the project from payment of grading, grubbing, and excavation permit fees, as well as inspection fees.	These exemptions provide savings to ensure the project is financially feasible. The project intends to meet all inspection and code requirements.

Development Standard or Requirement		Relevant Section/ Requirement	Requested Exemption	Rationale for Request
30.	Requirement for payment of permit and inspection fees	Title 20 – Environmental Protection Chapter 20.08 – Soil Erosion and Sedimentation Control Sections: 130 – Permit–Bond-Required. 140 – Permit-Bond-Conditions. 150 – Permit-Bond-Term.	MCC 20.08.130 – Permit-Bond-Required. MCC 20.08.140 – Permit-Bond-Conditions. MCC 20.08.150 – Permit-Bond-Term. An exemption from Sections 20.08.130, 20.08.140 and 20.08.150, MCC, Permit Bond, shall be granted to exempt the project from filing a bond and instead, allow Applicant to provide a cash equivalent to the County of Maui for grading, construction of drainage improvements and implementation of erosion control measures.	These exemptions provide flexibility to the Applicant in the type of bond funding for the grading work. This would assist in expediting the delivery of affordable workforce units. The project intends to meet all inspection and code requirements.

<u>Fee</u>	MCC Section	Value Per Unit	<u>Total Value</u>
Refuse Disposal Permit	8.04.040	\$ 1.00	\$ 204.00
Refuse Per Ton	8.04.050	\$ 181.00	\$ 36,924.00
Driveway Fee and Inspection	12.08.050	\$ 150.00	\$ 150.00
Water System Development Fees	14.07.030	\$ 3,125.00	\$ 637,500.00
Wastewater Assessment Fees	14.34.080	\$ 2,790.00	\$ 569,160.00
Electrical	16.18B	\$ 630.00	\$ 128,520.00
Plumbing	16.20B	\$ 1,500.00	\$ 30,600.00
Building Code	16.26B	\$ 880.00	\$ 179,520.00
Park Fees	18.16.320	\$ 5,880.00	\$ 1,199,520.00
Grading Permit	20.08.090	\$ 375.00	\$ 375.00
Sub Totals		\$ 15,161.00	\$ 2,782,473.00
Workforce Housing Guidelines	2.97.080	<\$101,323.52>	<\$20,670,000.00>
TOTALS			<\$17,887,527.00>

In summary, Chapter 2.97, MCC provides certain provisions for qualified affordable and/or workforce housing projects to be exempt from MCC provisions, provided that the housing project is consistent with the purpose and intent of this chapter, and meets minimum requirements of health and safety. As such, the above noted exemptions will be filed as part of the Kuikahi Village Project's Chapter 2.97, MCC application with the DHHC for review and action by the Maui County Council. These exemptions will expedite the delivery of affordable housing. The requested exemptions do not compromise the health and safety provisions of the proposed project.

ALTERNATIVES TO THE PROPOSED ACTION

V. ALTERNATIVES TO THE PROPOSED ACTION

The following is a discussion of the various development alternatives that have been considered by the Applicant as part of the planning process.

A. <u>PREFERRED ALTERNATIVE</u>

The preferred alternative is the proposed development of 202 residential housing units varying in type (i.e., multi-family/condominium, duplex, townhome, live-work, studio, single-family) to accommodate for different family sizes. These residences will be affordable for families and individuals earning 60 to 140 percent of the AMI, with units for sale. Parking for residents and visitors, as well as community pavilion, playground, and "spot parks" are among the amenities to be provided at the proposed development.

Furthermore, the location of the proposed project is in an area of Wailuku developed with existing residential developments of a similar nature, with existing infrastructure systems, and a handful of small businesses. Wailuku Town is the seat of State and County government offices on Maui. Wailuku also features a number of professional services, restaurants, and retail outlets.

For these reasons, the preferred alternative is considered to be the most viable alternative for providing much needed affordable housing in the Wailuku area. Furthermore, the project will be developed in an area with existing infrastructure systems.

B. <u>SITE DESIGN ALTERNATIVES</u>

With the proposed project site, a variety of alternative layouts could be considered as well as the types of residential units to be utilized. In designing a master plan for the site, the Applicant considered various factors in determining the size and scope of the development, including topography features, mix of housing units, market viability, ingress and egress from the site and community amenities to be provided. While there have been various iterations of site plan layouts for the project site, the proposed site plan provided in Chapter I of the document is the alternative that best met the Applicant's desire to provide a variety of housing types and price ranges, provide recreational amenities and would be a financially viable project. No public funds are anticipated to be utilized for the project development; the project is anticipated to be privately funded.

Additionally, per comments received from the Urban Design Review Board, the Applicant is also considering an alternative for the roundabout at the Kuʻikahi Drive and project driveway. The Applicant and its consultants are also studying the potential for a four-way intersection, with stop signs on the Kehalani Mauka Parkway and project driveway. This alternative will likely include left turn lanes on Kuʻikahi Drive to Kehalani Mauka Parkway

and the project driveway. However the roundabout is the preferred alternative for the intersection as it may provide traffic calming benefits in addition to mitigating traffic flow.

C. NO ACTION ALTERNATIVE

Under the "no action" alternative, the project site would remain "as is". The "no action" alternative is not considered to be in the best interest of the community at large as the "no action" alternative would not provide new affordable housing opportunities for Maui County residents. In this context, the proposed project is considered the most appropriate alternative.

D. <u>DEFERRED ACTION ALTERNATIVE</u>

A deferral of the proposed action means that the development proposal would be pursued at a later point in time. The deferral alternative is not considered viable from a project implementation standpoint. Delays in project implementation will likely result in higher development costs and greater uncertainty with respect to infrastructure systems adequacy. With this in mind, the "deferred action alternative" is not considered appropriate.

SUMMARY OF ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

VI. SUMMARY OF ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

Assessment of construction-related impacts, noise and air quality impacts, and potential impacts on the physical and socio-economic environment, as well as a CIA and consultation with the SHPD were carried out as part of the environmental assessment documentation process. The proposed development may result in limited, unavoidable construction-related impact on the environment, as described in Chapter II.

In the short term, construction associated with the proposed project will have a temporary impact on air quality from dust generation and discharge of exhaust from construction equipment during ground altering activities and site grading. Appropriate Best Management Practices will be incorporated to mitigate adverse construction-related impacts, including but not limited to, watering of exposed surfaces, installing dust screens, and regular maintenance of construction equipment.

Construction of the proposed project will also generate unavoidable short-term noise impacts. The use of properly maintained construction equipment will mitigate noise impacts caused by equipment. The incorporation of State Department of Health construction noise limits and curfew times are measures to mitigate noise impacts caused by construction activities.

The Applicant has consulted with the State Department of Transportation and the County Department of Public Works (DPW) to develop appropriate mitigation measures to address traffic impacts that will result from the proposed project. The project will provide access and related improvements, as outlined in the Traffic Impact Assessment Report (TIAR). Refer to **Appendix** "G". Coordination with the DPW is continuing on the proposed roundabout at the project's east driveway intersection with Ku'ikahi Drive. Future discussions will also be initiated on the traffic signal optimization at the Waiale Road/Ku'ikahi Drive intersection, as recommended by the TIAR.

In summary, the proposed action is not anticipated to create any significant, long-term adverse environmental effects.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES



VII. IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

The proposed action will not entail a substantial commitment of public services or facilities. Offsite infrastructure systems will be improved by the Applicant to address additional demands generated by the proposed project. Development of the proposed project will involve a commitment of energy, labor, fiscal, and material resources. The use of these resources, when weighed against the expected benefit to be derived from the residential project benefiting Maui's families and individuals at a variety of income levels, is not considered an adverse commitment.

LIST OF PERMITS AND APPROVALS



VIII. LIST OF PERMITS AND APPROVALS

The following permits and approvals may be required prior to the implementation of the project.

State of Hawai'i

- 1. District Boundary Amendment (from Maui County Council)
- 2. Chapter 343, Hawai'i Revised Statutes, Environmental Assessment
- 3. Chapter 11-46, Community Noise Control, as applicable
- 4. Chapter 11-60.1-33, Fugitive Dust, as applicable
- 5. National Pollutant Discharge Elimination System (NPDES) Permit

County of Maui

- 1. County of Maui, Chapter 2.97 Affordable Housing approval
- 2. Construction permits (i.e., building and grading permits)
- 3. Work on County Roadway approval

SIGNIFICANCE CRITERIA ASSESSMENT



IX. SIGNIFICANCE CRITERIA ASSESSMENT

The "Significance Criteria", defined in Chapter 11-200.1-13 of the Hawai'i Administrative Rules, were reviewed and analyzed to determine whether the proposed project will have significant impacts to the environment. The following criteria and analyses are provided.

1. Irrevocably commit a natural, cultural, or historic resources.

Though there were no endangered Hawaiian hoary bats recorded during the Flora and Fauna survey, it was noted that these mammals could occasionally pass through the area. As such, should they be observed in the project area, the U.S. Fish and Wildlife Service has guidelines for their protection which will be followed by the Applicant. No native bird species were found at the project area during the survey; however, there are native seabirds which are attracted to bright lights in the evenings and early dawn hours and can become disoriented and crash. As recommended in the survey, the Applicant will shield all significant outdoor lighting downward to minimize disorientation of these protected seabirds.

An Archaeological Inventory Survey (AIS) was conducted in 2005 which included the 14.9-acre project site. The AIS was compromised of historic background settlement pattern research, a complete pedestrian survey of the survey area, and subsurface testing via backhoe and reporting. Six (6) of the seven (7) historical sites related to the former use of the area for sugar cane cultivation were identified, and determined significant under Criterion "D" as having the potential to yield potential information important to understanding the history of the region and were determined to be adequately documented by SHPD. Refer to **Appendix "D"**. Six (6) of the seven (7) sites were located outside of the project area. Consequently, the AIS was accepted by the SHPD, and it was concluded that no further archaeological mitigation was necessary. Refer to **Appendix "D"**.

A CIA was also completed for the project, which included historical and cultural research and background information, as well as interviews with long-time area residents and members of the community who were familiar with the area. The CIA concluded that there would be no impacts to cultural resources in the area.

With the mitigation measures presented herein, the proposed project will not involve an irrevocable commitment to loss or destruction of any natural, cultural, or historic resources.

2. Curtail the range of beneficial uses of the environment.

The proposed action will be implemented adjacent to existing residential developments of a similar nature, as well as existing commercial development, and the commitment of land resources for the proposed action will not curtail the range of beneficial uses of the environment. The project site, although designated for agricultural use, has not been in agricultural production for some time. The proposed use of the site for development of a new residential subdivision is compatible with surrounding residential uses.

3. <u>Conflict with the State's environmental policies or long-term environmental goals</u> established by law.

The proposed action does not conflict with the policies and guidelines of Chapter 343, HRS. An environmental assessment is being carried out to ensure the proposed project will not have adverse impacts on the environmental resources.

4. <u>Have a substantial adverse effect on the economic welfare, social welfare, or cultural practices of the community and State.</u>

The proposed action will have a beneficial effect on the local economy during the short and long term. As previously discussed, positive economic and social impacts are anticipated as a result of the project including construction-related jobs, real property assessment revenues, and contribution of water, wastewater, and educational assessment fees. In the long-term, residents at the proposed development will support nearby local grocery stores and businesses. Residents living in live-work units will also be able to operate their small-businesses out of their homes, saving on potential storefront rent that they would otherwise expend at other locations.

5. Have a substantial adverse effect on public health.

Based on the results of the Phase 1 ESA prepared for the originally proposed Pu'unani project, which was located in the same project area as the Kuikahi Village Project, there was no evidence of hazardous materials at the project area. Up until the mid-1980's, the area was used for sugar cane and pineapple cultivation. During future site work, if large amounts of construction debris or unidentifiable substances (i.e., containers) are discovered, proper waste identification, testing, and applicable waste handling and disposal procedures will be implemented. Use of fertilizers within residential lots and within common areas will be in a manner consistent with best landscape practices so as to avoid the overuse of soil amendments and nutrients. With such practices, there are no anticipated adverse effects on groundwater resources attributed to fertilizer use. No adverse impacts to surface, underground, or marine resources are anticipated.

The project is not anticipated to result in long-term air or noise impacts. Additionally, the proposed action is not anticipated to create significant direct or indirect foreseeable greenhouse gas (GHG) emissions, and does not fall within the threshold of mandatory GHG reporting. As such, no adverse impact to public health or welfare is anticipated as a result of the proposed action.

6. <u>Involve adverse secondary impacts, such as population changes or effect on public</u> facilities.

The proposed Kuikahi Village Project will provide needed affordable housing for Maui's families at various income levels. Many of these families and individuals may work in the business districts of Kahului and Wailuku, but live further away due to lack of affordable housing in these areas. The proposed project is not expected to attract additional residents who are new to Maui, but to instead, allow for existing, local families and individuals to live in closer proximity to their work places, commercial and business developments, and public facilities. As such, the project is not anticipated to involve substantial secondary impacts due to population change. Secondary impacts on public facilities are not anticipated. The Applicant is coordinating with the DWS and DEM to determine the level of infrastructural improvements needed to provide water and wastewater services, respectively, for the proposed project.

7. <u>Involve a substantial degradation of environmental quality.</u>

No substantial degradation of environmental quality resulting from the action is anticipated. Best Management Practices (BMPs) and appropriate erosion control measures will be utilized during the construction period. Drainage system improvements will be constructed in accordance with applicable regulatory design standards to ensure that surface runoff will not have an adverse effect on adjacent or downstream properties.

Any potential short-term impacts to air and noise quality during the construction phase of the project, will be mitigated through employing BMPs. In the long term, the project will not adversely impact air quality and ambient noise.

8. <u>Be individually limited but cumulatively have substantial adverse effects upon the environment or involves a commitment for larger actions.</u>

The proposed action is a stand-alone project, and does not represent a commitment to a larger action. There are no anticipated cumulative impacts associated with the proposed action. The Applicant does own additional lands surrounding the project site, but there is no plan for development of lands outside of the project site at this time. Any future development of additional lands would require separate regulatory reviews and approvals.

9. <u>Have a substantial adverse effect on a rare, threatened, or endangered species, or its habitat.</u>

As previously mentioned there were no endangered Hawaiian hoary bats recorded during the Flora and Fauna survey; however, should they show up in the project area, the U.S. Fish and Wildlife Service has guidelines for their protection which will be followed by the Applicant. No native bird species were found at the project area during the survey but, as recommended in the survey, the Applicant will shield all significant outdoor lighting downward to minimize disorientation of these protected seabirds. Refer to **Appendix "C"**. The project site is located adjacent to existing residential developments of a similar nature.

The project is not anticipated to substantially affect rare, threatened, or endangered species, or its habitat.

10. Have a substantial adverse effect on air or water quality or ambient noise levels.

Construction activities may pose a temporary short-term impact on air and noise quality; however, impacts will be mitigated through the use of BMPs. Dust control measures, such as regular watering and sprinkling, and installation of dust screens will be implemented to minimize wind-blown emissions. Noise impacts will be mitigated by limiting construction to daylight work hours. Utilizing approved BMPs, significant impacts to water quality are not anticipated.

In the long term, the proposed action is not anticipated to have a significant adverse impact on air and water quality or ambient noise levels.

11. Have a substantial adverse effect on or be likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, sea level rise exposure area, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.

The project site is situated inland and is not anticipated to have any adverse impact upon coastal waters or resources, beaches, estuaries, or other fresh water bodies.

According to the Federal Emergency Management Agency's Flood Insurance Rate Maps currently in effect, the project site falls within Zone X (unshaded), an area of minimal flooding. The project site is located outside of the tsunami inundation zone. In addition, the project site is located outside of the 3.2-foot projected sea level rise exposure area.

Drainage improvements will be designed to mitigate runoff in accordance with County drainage and stormwater rules and regulations. During construction, recommended BMPs will be implemented for erosion and sedimentation control to minimize potential impacts to water quality.

12. <u>Have a substantial adverse effect on scenic vistas and viewplanes, during day or night identified in county or state plans or studies.</u>

The proposed development has been designed to integrate with its surrounding environment in an effort to not block established scenic vistas, viewplanes, or corridors during the day or night. Refer to **Appendix "A-1"**. The project is located inland, away from coastal and open space areas and will not substantially affect coastal scenic or open space resources.

13. Require substantial energy consumption or emit substantial greenhouse gasses.

The proposed action will involve the short-term commitment of fuel for equipment, vehicles, and machinery during construction activities. However, this use is not anticipated to result in a substantial consumption of energy resources or substantial

emission of greenhouse gasses. In the long term, the project will create an additional demand for electricity. However, this demand will not be substantially or excessively more than the energy consumed by similar developments throughout the region.

In summary, the project site is situated adjacent to existing residential uses of a similar nature, and in close proximity to services and commercial areas in the Wailuku and Kahului region. This project will be developed in an area with existing infrastructure systems, and will not extend County service areas. The proposed project is not anticipated to have a significant adverse impact on the physical, cultural and socio-economic environments. Based on the preceding analysis in this Final EA document, and in accordance with the significance criteria set forth in 11-200.1-13, HAR, a finding of no significant impact (FONSI) has been determined.

PARTIES CONSULTED DURING THE PREPARATION OF THE DRAFT ENVIRONMENTAL ASSESSMENT; LETTERS RECEIVED AND RESPONSES TO SUBSTANTIVE COMMENTS



X. PARTIES CONSULTED DURING THE PREPARATION OF THE DRAFT ENVIRONMENTAL ASSESSMENT; LETTERS RECEIVED AND RESPONSES TO SUBSTANTIVE COMMENTS

The following agencies, organizations, and individuals were consulted during preparation of the Draft Environmental Assessment (EA). This Chapter addresses early consultation comments received from these agencies, organizations, and individuals.

Federal Agencies

- Kahana Stone, Soil Conservationist Natural Resources Conservation Service U.S. Department of Agriculture 77 Hookele Street, Suite 202 Kahului, Hawai'i 96732
- Larry Yamamoto, State Conservationist Natural Resources Conservation Service U.S. Department of Agriculture P.O. Box 50004 Honolulu, Hawai'i 96850-0001
- Linda Speerstra, Chief
 U.S. Department of the Army, Regulatory
 Branch
 U.S. Army Engineer District, Honolulu
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 Fort Shafter, Hawai'i 96858-5440
- Ryan Okahara, Field Office Director
 U.S. Department of Housing and Urban
 Development
 1132 Bishop Street, Suite 1400
 Honolulu, Hawai'i 96813-4918
- Michelle Bogardus, Island Team Leader U.S. Fish and Wildlife Service 300 Ala Moana Blvd., Rm. 3-122 Honolulu, Hawai'i 96850

State Agencies

 Curt T. Otaguro, Comptroller State of Hawai'i Department of Accounting and General Services 1151 Punchbowl Street, #426 Honolulu, Hawai'i 96813

- 7. Denise Albano, Chair State of Hawai'i Department of Agriculture 1428 South King Street Honolulu, Hawai'i 96814-2512
- M. Kaleo Manuel, Deputy Director State of Hawai'i Commission on Water Resource Management P.O. Box 621 Honolulu, Hawai'i 96809
- Christine Kishimoto, Superintendent State of Hawai'i Department of Education P.O. Box 2360 Honolulu, Hawai'i 96804
- State of Hawai'iDepartment of Health1250 Punchbowl St., Room 325Honolulu, Hawai'i 96813
- 11. Alec Wong, P.E., Chief State of Hawai'i Department of Health Clean Water Branch Hale Ola, Room 225 2827 Waimano Home Road Pearl City, Hawai'i 96782
- 12. Patti Kitkowski, District Environmental Health Program Chief State of Hawai'i Department of Health Maui Sanitation Branch 54 South High Street, Room 300 Wailuku, Hawai'i 96793

- Keith Kawaoka, Acting Director State of Hawai'i
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- Suzanne Case, Chairperson
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- Denise Iseri-Matsubara, Executive Director State of Hawai'i Hawai'i Housing Finance and Development Corporation 677 Queen St # 300 Honolulu, Hawai'i 96813
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- William Aila, Jr., Interim Chair State of Hawai'i
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- Sylvia Hussey, Chief Executive Officer State of Hawai'i Office of Hawaiian Affairs 560 N. Nimitz Highway, Suite 200 Honolulu, Hawai'i 96817

- 22. Mary Alice Evans, Director State of Hawai'i Office of Planning P.O. Box 2359 Honolulu, Hawai'i 96804
- Dan Orodenker, Executive Officer State of Hawai'i State Land Use Commission P.O. Box 2359 Honolulu, Hawai'i 96804

Maui County Agencies

- 24. Eric Nakagawa, Director
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- 25. David Thyne, Chief County of Maui Department of Fire and Public Safety 200 Dairy Road Kahului, Hawaii 96732
- 26. Karla Peters, Director County of Maui Department of Parks and Recreation 700 Halia Nakoa Street, Unit 2F Wailuku, Hawai'i 96793
- Michele Chouteau McLean, Director County of Maui Department of Planning 2200 Main Street, Suite 315 Wailuku, Hawai'i 96793
- 28. Tivoli Faaumu, Chief
 County of Maui
 Police Department
 55 Mahalani Street
 Wailuku, Hawai'i 96793
- Rowena Dagdag-Andaya, Director County of Maui Department of Public Works 200 South High Street Wailuku, Hawaii 96793

- 30. Marc Takamori, Director
 County of Maui
 Department of Transportation
 David Trask Building, Suite 102
 2145 Kaohu Street
 Wailuku, Hawai'i 96793
- 31. Jeff Pearson, Director
 County of Maui
 Department of Water Supply
 200 South High Street, 5th Floor
 Wailuku, Hawai'i 96793
- 32. Herman Andaya, Emergency Management
 Officer
 County of Maui
 Emergency Management Agency
 200 South High Street
 Wailuku, Hawai'i 96793
- Honorable Alice Lee, Council Chair
 Maui County Council
 200 South High Street
 Wailuku, Hawai'i 96793

Maui County Organizations

- 34. Hawaiian Telcom60 South Church StreetWailuku, Hawai'i 96793
- 35. Tiana Raymonds
 Kehalani Community Organization
 Scott Matsuura, President
 P.O. Box 1530
 Wailuku, Hawai'i 96793
- 36. Debbie Cabebe, Chief Executive OfficerMaui Economic Opportunity99 Mahalani StreetWailkuku, Hawai'i 96793
- 37. Michael Grider, Manager, Engineering Maui Electric Company, Ltd. P.O. Box 398 Kahului, Hawai'i 96733
- 38. Spectrum 158 Ma'a Street Kahului, Hawai'i 96732
- Travis Polido, President
 Waikapu Community Association
 P.O. Box 3046
 Wailuku, Hawai'i 96793

- Waikapu Gardens Homeowners Association
 P.O. Box 2390
 Wailuku, Hawai'i 96793
- 41. Kristen Holmes
 Wailuku Community Association
 c/o Swan Interiors
 2103 W Vineyard Street
 Wailuku, Hawai'i 96793
- 42. Joseph G. Blackburn II
 Waiolani Mauka Community Association
 P.O. Box 1067
 Wailuku, Hawai'i 96793
- 43. Wailuku Heights Extension Unit I Community Association P.O. Box 698 Wailuku, Hawai'i 96793
- 44. Lester Yano
 Wailuku Heights Extension Unit II
 Community Association
 c/o Hawaiiana Management Co
 140 Hoohana Street, Suite 208
 Kahului, Hawai'i 96732
- 45. Hawaiiana Management Company Wailuku Heights Extension Unit II Homeowners Association 1305 N. Holopono Street, Unit 3A Kihei, Hawaii 96753
- 46. Wayne Hedani, Agent Wailuku Heights Extension Community Association 586 Ku'ikahi Drive Wailuku, Hawai'i 96793
- 47. Joseph G. Blackburn II
 Waiolani Community Association
 P.O. Box 1067
 Wailuku, Hawai'i 96793
- 48. Joseph G. Blackburn II
 Waiolani Elua Community Association
 P.O. Box 1067
 Wailuku, Hawai'i 96793



Natural Resources Conservation Service

Pacific Islands Area Kahului Field Office

November 17, 2020

77 Hookele St., # 202 Kahului, HI 96732

Voice 808-871-5500 ext. 3 Fax 855-878-2454 Ms. Charlene Shibuya Munekiyo Hiraga 305 High St., Suite 104 Wailuku, HI 96793

Subject: Early Consultation for the Proposed Kuikahi Residential

Project; TMK No. (2) 3-5-002: 003 (por.); Wailuku, Maui, HI

Dear Ms. Shibuya:

I have no comments.

Sincerely,

Gerald Gregory

District Conservationist



Karlynn K. Fukuda

Mark Alexander Roy VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Gerald Gregory, District Conservationist Natural Resources Conservation Service Pacific Islands Area, Kahului Field Office 77 Ho'okele Street, Suite 202 Kahului, Hawai'i 96732

> SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

> > Wailuku. Maui. Hawai'i

Dear Mr. Gregory:

Thank you for your early consultation response letter dated November 17, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we acknowledge that the Natural Resources Conservation Service has no comments on the proposed project at this time.

We would also like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya

Senior Associate

CSS:ab

Linda Munsell, County of Maui, Department of Housing and Human Concerns Dovle Betsill, Kuikahi Properties, LLC

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DAVID Y. IGE GOVERNOR



CURT T. OTAGURO COMPTROLLER

AUDREY HIDANO DEPUTY COMPTROLLER

STATE OF HAWAII DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)20.193

NOV 18 2020

Ms. Charlene Shibuya Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Maui, Hawaii 96793

Dear Ms. Shibuya:

Subject:

Early Consultation Request for

Proposed Kuikahi Residential

Wailuku, Maui, Hawaii

TMK: (2) 3-5-002:003 (por.)

Thank you for the opportunity to comment on the subject project. We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.

If you have any questions, your staff may call Ms. Dora Choy of the Planning Branch at 586-0488.

Sincerely,

CHRISTINE L. KINIMAKA Public Works Administrator

DC:mo

c: Mr. Wade Shimabukuro, DAGS MDO



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Christine L. Kinimaka, Public Works Administrator State of Hawai'i Department of Accounting and General Services P.O. Box 119 Honolulu, Hawai'i 96810

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. Kinimaka:

Thank you for your early consultation response letter dated November 18, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we acknowledge that the Department has no comments at this time, as the proposed project does not impact any of the Department's projects or existing facilities.

We would also like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC

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DAVID Y. IGE



SUZANNE D. CASE

KAMANA BEAMER, PH.D. MICHAEL G. BUCK ELIZABETH A. CHAR, M.D. NEIL J. HANNAHS WAYNE K. KATAYAMA PAUL J. MEYER

M. KALEO MANUEL

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES COMMISSION ON WATER RESOURCE MANAGEMENT

P.O. BOX 621 HONOLULU, HAWAII 96809

December 1, 2020

REF: RFD.5506.6

TO: Ms. Charlene Shibuya

Munekiyo Hiraga

FROM: M. Kaleo Manuel, Deputy Director

Commission on Water Resource Management

SUBJECT: Early Consultation Request for the Proposed Kuikahi Residential Project

FILE NO.: RFD.5506.6

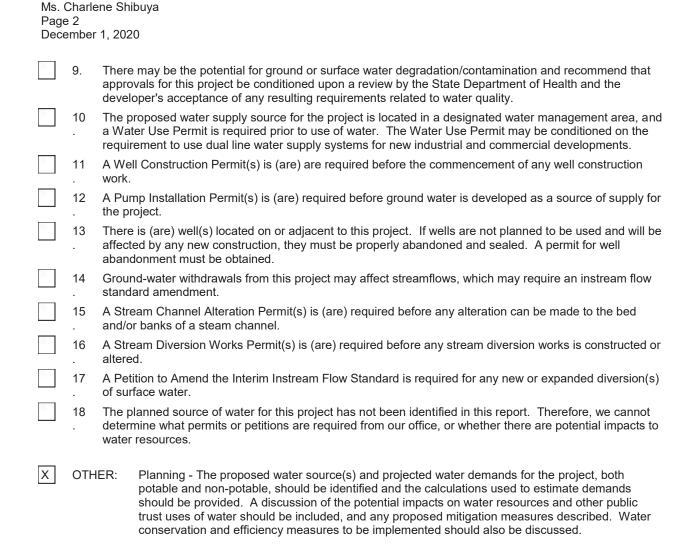
TMK NO.: (2) 3-5-002:003(por.)

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at http://dlnr.hawaii.gov/cwrm.

Our comments related to water resources are checked off below.

X	1.	We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
.9)—	2.	We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
(3)—	3.	We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
X	4.	We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EAP as having high water efficiency can be found at http://www.epa.gov/watersense.
Χ	5.	We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://planning.hawaii.gov/czm/initiatives/low-impact-development/
X	6.	We recommend the use of alternative water sources, wherever practicable.
X	7.	We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at http://energy.hawaii.gov/green-business-program.
X	8.	We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at

http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH Irrigation Conservation BMPs.pdf.



If you have any questions, please contact Lenore Ohye of the Commission staff at 587-0216.



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

M. Kaleo Manuel, Deputy Director State of Hawai'i Commission on Water Resource Management P.O. Box 621 Honolulu, Hawai'i 96809

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i, RFD.5506.6

Dear Mr. Manuel:

Thank you for your early consultation response letter dated December 1, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter:

- We acknowledge your comment to work with the County of Maui, Department of Water Supply (DWS) to have the project incorporated into the County's Water Use and Development Plan. Your comment has been forwarded to the Applicant and its project team for consideration. Additionally, we note that the DWS also received a copy of the Early Consultation letter and provided comments on the project.
- To the extent practicable, water efficient fixtures and practices will be encouraged for implementation within residences of the proposed project. Furthermore, the resource you provided regarding Leadership in Environmental Design certification will be reviewed.
- Best Management Practices (BMPs), including utilizing Low Impact Design measures for stormwater management to minimize the impact of the proposed project on the existing area's hydrology while maintaining onsite infiltration and prevention of polluted runoff will be implemented.
- We acknowledge your comment regarding the encouragement for use of alternative water sources. We note that the proposed project is anticipated to be serviced by the County's existing municipal water system.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

- We note your comment recommending participation in the Hawaii Green Business Program. Your comment has been forwarded to the Applicant for consideration.
- We acknowledge your comment regarding the use of landscape irrigation conservation BMPs endorsed by the Landscape Industry Council of Hawaii.
 The resource provided in your letter will be reviewed for applicability to the proposed project.
- We acknowledge your comment regarding identification of water source(s) and demand for the proposed project. Chapter II of the Environmental Assessment (EA) prepared for the project will include a discussion on the potential impacts to water resources and proposed mitigation measures. Water conservation and efficiency measures will be implemented at the project and will be further described in Chapter II of the EA.

Furthermore, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC Stacy Otomo, Otomo Engineering, Inc.

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STATE OF HAWAI'I

DEPARTMENT OF EDUCATION

P.O. BOX 2360 HONOLULU, HAWAI'I 96804

OFFICE OF FACILITIES AND OPERATIONS

November 27, 2020

Charlene Shibuya Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Re: Early Consultation Request for the Proposed Kuikahi Residential Project

Wailuku, Maui, Hawaii, TMK 9-1-181:042

Dear Ms. Shibuya:

The Hawaii State Department of Education (HIDOE) has the following comments in the preparation of a Draft Environmental Assessment (DEA) for the proposed Kuikahi Residential Project (Project). The Project is envisioned to develop approximately 200 fee simple residential units targeting income groups with Area Median Incomes at or below 120 percent on approximately14.9 acres of land located in Wailuku, Island of Maui, TMK 3-5-002:Por. 003.

The HIDOE schools servicing the Project are Puu Kukui Elementary, Maui Waena Intermediate, and Maui High. All three schools are over capacity. This overcapacity is expected to remain over the next five years.

The Project is located within the Central Maui School Impact District with fee amounts of \$2,371 for multi-family residential units and \$5,373 for single-family residential units. Kuikahi Associates, LLC is encourage to meet with the HIDOE as early as possible to discuss executing an Educational Contribution Agreement.

The DEA should discuss whether accessory dwelling units will be allowed.

Thank you for the opportunity to comment. Should you have questions, contact Robyn Loudermilk, Planner of the Faculties Development Branch, Planning Section, at (808) 784-5093 or via email at robyn.loudermilk@k12.hi.us.

Respectfully,

Kenneth G. Masden II Public Works Manager

Planning Section

KGM:rll

c: Kathleen Dimino, Complex Area Superintendent, Baldwin/Kekaulike/Maui Complex Area



Karlynn K. Fukuda PRESIDENT Mark Alexander Roy VICE PRESIDENT

Tessa Munekiyo Ng

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Kenneth G. Masden II, Public Works Manager Planning Section State of Hawai'i Department of Education P.O. Box 2360 Honolulu, Hawai'i 96804

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Mr. Masden II:

Thank you for your early consultation response letter dated November 27, 2020 on the subject project. We would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following responses to comments noted in your letter.

- 1. We acknowledge that some of the Department of Education's (DOE) elementary, intermediate, and high school servicing the area are over capacity and some have many out of district students. The Applicant will continue collaborating with the DOE on redistricting strategies. The Applicant will also continue to assist in advancing plans to develop new schools and expanding existing schools in previous proposed large developments in the region which committed to land and infrastructure contributions.
- 2. The Applicant understands there are school impact fees associated with the project being located in the Central Maui Impact District. As such, the Applicant is prepared to pay for prescribed impact fees and plans to meet with your department to discuss executing an Educational Contribution Agreement.

Maui: 305 High Street, Suite 104 * Wailuku, Hawaii 96793 * Tel: 808.244.2015 * Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Kenneth G. Masden II, Public Works Manager September 7, 2021 Page 2

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

CC: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC K.\DATA\WV Regenesis\Wailuku AH\Applications\ECL\Response Letters\DOE.response.docx

DAVID Y. IGE GOVERNOR OF HAWAI



ELIZABETH A. CHAR, M.D.
DIRECTOR OF HEALTH

Lorrin W. Pang, M.D., M.P.H. District Health Officer

STATE OF HAWAII DEPARTMENT OF HEALTH

Maui District Health Office 54 South High St. Rm. #301 Wailuku, HI 96793

November 20, 2020

Ms. Charlene Shibuya Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Ms. Shibuya:

Subject: Early Consultation Request for the Proposed Kuikahi Residential

Project, Wailuku, Maui, Hawaii TMK: (2) 3-5-002:003 (por)

Thank you for the opportunity to review this project. We have the following comments to offer:

We are unable to offer any comments for the proposed project as the wastewater system was not satisfactorily addressed for our review. Please provide wastewater disposal method for the proposed project for review. If you have any questions, please call Roland Tejano, Environmental Engineer, at 808 984-8232.

It is strongly recommended that you review the department's website at https://health.hawaii.gov/epo/files/2018/05/DOHEHA.LandUseContactList.20180502.pdf and any comments specifically applicable to this project should be adhered to.

Should you have any questions, please contact me at 808 984-8230 or email me at patricia.kitkowski@doh.hawaii.gov.

Sincerely,

Patti Kitkowski

District Environmental Health Program Chief

Sina Pruder, Acting EMD Administrator



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Patti Kitkowski
District Environmental Health Program Chief
State of Hawai'i
Department of Health
Maui District Health Office
54 South High Street, Room #301
Wailuku, Hawai'i 96793

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. Kitkowski:

Thank you for your early consultation response letter dated November 20, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter:

As the proposed project is in its preliminary development stage, detailed information as it relates to the wastewater system was not included in the Applicant's request for early consultation comments from the Department of Health. However, the Applicant confirms that the project will connect to the County's wastewater system, and additional wastewater disposal information will be included in the Draft Environmental Assessment (EA) which is being prepared for the proposed action. Upon the publication of the Draft EA in the Office of Environmental Quality Control's *The Environmental Notice*, a copy of the document will be provided to the Department for additional review and comment.

Furthermore, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

Patti Kitkowski September 7, 2021 Page 2

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

Linda Munsell, County of Maui, Department of Housing and Human Concerns CC:

Doyle Betsill, Kuikahi Properties, LLC Stacy Otomo, Otomo Engineering, Inc.
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DAVID Y. IGE GOVERNOR OF HAWAII





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

November 24, 2020

Munekiyo Hiraga

Attn: Ms. Charlene Shibuya, Sr Associate

305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Ms. Shibuya:

SUBJECT: Early Consultation Request for the Proposed Kuikahi Residential Project

located at Wailuku, Island of Maui; TMK: (2) 3-5-002:003 (por.) on behalf

via email: planning@munekiyohiraga.com

of Kuikahi Properties LLC

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division, (b) Division of Forestry & Wildlife, and (c) Land Division-Maui District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji Land Administrator

Enclosures

cc: Central Files

DAVID Y. IGE GOVERNOR OF HAWAII





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

November 13, 2020

FROM:		MEMORANDUM		
TO:	TO	DLNR Agencies: Div. of Aquatic ResourcesDiv. of Boating & Ocean Recreation X_Engineering Division (DLNR.ENGR@hawaii.gov) X_Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov) Div. of State Parks X_Commission on Water Resource Management (DLNR.CWRM@hawaii.gov) Office of Conservation & Coastal Lands X_Land Division - Maui District (daniel.l.ornellas@hawaii.gov) X_Historic Preservation (DLNR.Intake.SHPD@hawaii.gov)		
10.	FROM: SUBJECT: LOCATION: APPLICANT:	Russell Y. Tsuji, Land Administrator Early Consultation Request for the Proposed Kuikahi Residential Project Wailuku, Island of Maui; TMK: (2) 3-5-002:003 (por.) Munekiyo Hiraga on behalf of Kuikahi Properties LLC		

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by **November 23, 2020.**

If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov. Thank you.

() We l	We have no objections. We have no comments. Comments are attached.			
Signed: 459				
Print Name:	Carty S. Chang, Chief Engineer			
Division:	Engineering Division			
Date:	Nov 19, 2020			

Attachments

CC:

Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES ENGINEERING DIVISION

LD/Russell Y. Tsuji

Ref: Early Consultation Request for the Proposed Kuikahi Residential Project

Location: Wailuku, Island of Maui TMK(s): (2) 3-5-002:003 (por.)

Applicant: Munekiyo Hiraga on behalf of Kuikahi Properties LLC

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (http://gis.hawaiinfip.org/FHAT).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- o <u>Hawaii Island</u>: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- o Kauai: County of Kauai, Department of Public Works (808) 241-4896.

Signed:	959			
0	CARTY S. CHANG, CHIEF ENGINEE	R		

Date: Nov 19, 2020

DAVID Y. IGE GOVERNOR OF HAWAII





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

November 13, 2020

MEMORANDUM

	DLNR Agencies:Div. of Aquatic ResortDiv. of Boating & OceX Engineering DivisionDiv. of Forestry & WiDiv. of State ParksX Commission on WateOffice of ConservatioX Land Division – MauiX Historic Preservation	ean Recreation (DLNR.ENGR@ Idlife (<u>rubyrosa</u> er Resource Ma en & Coastal La District (<u>daniel</u>	t.terrago@hawaii.gov) nagement (DLNR.CWRM@hawaii.gov) nds l.ornellas@hawaii.gov)				
SUBJECT: LOCATION:	Russell Y. Tsuji, Land A Early Consultation Requ Wailuku, Island of Maui; Munekiyo Hiraga on beh	dministrator lest for the Prop TMK: (2) 3-5-0					
Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by November 23, 2020 .							
If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov . Thank you.							
		() We ha	ave no objections. ave no comments. ents are attached. or				
		Print Name:	DAVID G. SMITH, Administrator				
		Division:	Division of Forestry and Wildlife				
		Date:	Nov 23, 2020				

Attachments

cc: Central Files

DAVID Y. IGE GOVERNOR OF HAWAII





STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES DIVISION OF FORESTRY AND WILDLIFE 1151 PUNCHBOWL STREET, ROOM 325 HONOLULU, HAWAII 96813

November 23, 2020

SUZANNE D. CASE
CHARPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA

M. KALEO MANUEL

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILD LIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

MEMORANDUM

Log. No. 2890

TO:

RUSSELL Y. TSUJI, Administrator

Land Division

FROM:

DAVID G. SMITH, Administrator

mole

SUBJECT:

Division of Forestry and Wildlife Comments on Early Consultation Requests

for the Proposed Kuikahi Residential Project

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your inquiry regarding review of the early consultation request for the proposed Kuikahi Residential Project in Wailuku, Maui, TMK: (2) 3-5-002:003 (por.). The proposed project consists of constructing a new residential community that includes multi-family, duplex, live-work, studio, and single-family units, on an approximately 14.9-acre portion of land.

The State listed Blackburn's Sphinx Moth (BSM; *Manduca blackburni*) has a historic range that encompasses the project area. Larvae of BSM feed on many nonnative hostplants that include tree tobacco (*Nicotiana glauca*) which grows in disturbed soil. We recommend contacting our Maui DOFAW office at (808) 984-8100 for further information about where BSM may be present and whether a vegetation survey should be conducted to determine the presence of plants preferred by BSM. To avoid harm to BSM, DOFAW recommends removing plants less than one meter in height or during the dry time of the year. If you remove tree tobacco over one meter in height or disturb the ground around or within several meters of these plants they must be checked thoroughly for the presence of eggs and larvae.

State listed waterbirds such as the Hawaiian Duck (*Anas wyvilliana*), Hawaiian Stilt (*Himantopus mexicanus knudseni*), Hawaiian Coot (*Fulica alai*) and Hawaiian Goose or Nēnē (*Branta sandvicensis*) have the potential to occur in the vicinity of the proposed project site. It is against State law to harm or harass these species. If any of these species are present during construction activities, then all activities within 100 feet (30 meters) should cease, and the bird should not be approached. Work may continue after the bird leaves the area of its own accord. If a nest is discovered at any point, please contact the Maui DOFAW office at the aforementioned number.

DOFAW is concerned about attracting vulnerable birds to areas that may host nonnative predators such as cats, rodents, and mongoose. Additionally, construction and improvements to the are likely to increase the number of users and may generate more predator attractants. We recommend

taking action to minimize predator presence; remove cats, place bait stations for rodents and mongoose, and provide covered trash receptacles.

The State listed Hawaiian Hoary Bat or 'Ōpe'ape'a (*Lasiurus cinereus semotus*) has the potential to occur in the vicinity of the project area and may roost in nearby trees. If any site clearing is required this should be timed to avoid disturbance during the bat birthing and pup rearing season (June 1 through September 15). If this cannot be avoided, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed without consulting DOFAW.

DOFAW recommends minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens, vertebrate and invertebrate pests (e.g. Little Fire Ants), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the Maui Invasive Species Committee at (808) 573-6472 in planning, design, and construction of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species.

DOFAW recommends using native plant species for landscaping that are appropriate for the area (i.e. climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai'i-Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (https://sites.google.com/site/weedriskassessment/home). We recommend that you refer to https://sites.google.com/site/weedriskassessment/home).

We note that artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in collision with manmade artifacts or grounding of birds. For nighttime lighting that might be required, DOFAW recommends that all lights be fully shielded to minimize impacts. Nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. This is the period when young seabirds take their maiden voyage to the open sea. For illustrations and guidance related to seabird-friendly light styles that also protect the dark, starry skies of Hawai'i please visit: https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf.

We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Koa Matsuoka, Protected Species Habitat Conservation Planning Associate at (808) 587-4149 or koa.matsuoka@hawaii.gov.

DAVID Y. IGE GOVERNOR OF HAWAII



Central Files

CC:



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

November 13, 2020

MEMORANDUM

TO:	DLNR Agencies: Div. of Aquatic ResourcesDiv. of Boating & Ocean RecreationX Engineering Division (DLNR.ENGR@hawaii.gov)Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)Div. of State ParksX Commission on Water Resource Management (DLNR.CWRM@hawaii.govOffice of Conservation & Coastal LandsX Land Division - Maui District (daniel.l.ornellas@hawaii.gov)X Historic Preservation (DLNR.Intake.SHPD@hawaii.gov)					
FROM: SUBJECT: LOCATION: APPLICANT:	Russell Y. Tsuji, Land Administrator Early Consultation Request for the Proposed Kuikahi Residential Project Wailuku, Island of Maui; TMK: (2) 3-5-002:003 (por.) Munekiyo Hiraga on behalf of Kuikahi Properties LLC					
Transmitted for your review and comment is information on the above-referenced subject matter. Please submit any comments by November 23, 2020.						
If no response is received by the above date, we will assume your agency has no comments. Should you have any questions about this request, please contact Darlene Nakamura at darlene.k.nakamura@hawaii.gov . Thank you.						
	() We have no objections. () We have no comments. () Comments are attached. Signed: Print Name: Daniel Ornellas Division: Date: Date: Division: Date: Division: Date: Division: Division: Date: Division: Division: Date: Division: Divi					
Attachments						



Karlynn K. Fukuda PRESIDENT Mark Alexander Roy

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo

September 7, 2021

Russell Y. Tsuji, Land Administrator State of Hawai'i Department of Land and Natural Resources P.O. Box 621 Honolulu, Hawai'i 96809

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Mr. Tsuji:

Thank you for your early consultation response letter dated November 24, 2020, transmitting comments from the Engineering Division in a letter dated November 19, 2020, Division of Forestry and Wildlife in a letter dated November 23, 2020, and Land Division in a transmittal dated November 16, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter:

ENGINEERING DIVISION

Thank you for your comment regarding the National Flood Insurance Program. The Applicant will include a discussion of the project site's Flood Hazard Zone designation in Chapter II of the Draft Environmental Assessment (EA).

DIVISION OF FORESTRY AND WILDLIFE (DOFAW)

We acknowledge the DOFAW's comments recommending consultation with the Division's Maui office regarding the Blackburn's Sphinx Moth and other potential species which may be present at the project site. The Applicant and its project consultant will conduct a Flora and Fauna Survey of the project site to identify any known plant and animal species and provide recommended mitigation measures to avoid removal or harm to any species. Furthermore, the Applicant, to the best of their ability, will follow recommended measures regarding the minimization of movement of plant or soil materials between worksites, the use of native plant species for landscaping at the project site, and fully shielded lighting to minimize impacts to seabirds.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Russell Y. Tsuji, Land Administrator September 7, 2021 Page 2

LAND DIVISION

We acknowledge that the Division has no comments on the proposed project.

Additionally, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC

Robert Hobdy

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DAVID Y. IGE GOVERNOR



STATE OF HAWAII DEPARTMENT OF PUBLIC SAFETY

919 Ala Moana Boulevard, 4th Floor Honolulu, Hawaii 96814 MAX N. OTANI DIRECTOR

Maria C. Cook Deputy Director Administration

Tommy Johnson Deputy Director Corrections

Jordan Lowe Deputy Director Law Enforcement

No. _____2020-4283

December 3, 2020

Charlene Shibuya Senior Associate Munekiyo Hiraga 305 High street, Suite 104 Wailuku, Hawaii 96793

Subject: Early Consultation Request for the Proposed Kuikahi Residential Project;

TMK No. (2)3-5-002:003(por); Wailuku, Maui, Hawaii

Dear Ms. Shibuya:

In response to your letter dated November 4, 2020, we reviewed the proposed new Kuikahi Residential Project development and have no comments. The project does not impact any of the Department of Public Safety projects and or existing facilities.

If you or your staff have any questions, please contact Mr. Wayne Takara, Chief Planner, at 587-3463.

Sincerely,

KNOR

Maria C. Cook Deputy Director of Administration

 Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC Wayne Takara, PSD Chief Planner



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Maria C. Cook, Deputy Director of Administration State of Hawai'i Department of Public Safety 919 Ala Moana Boulevard, 4th Floor Honolulu. Hawai'i 96814

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. Cook:

Thank you for your early consultation response letter dated December 3, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we acknowledge that the Department has no comment on the proposed project, as it does not impact any of the Department's projects or existing facilities.

We would also like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns
Dovle Betsill, Kuikahi Properties, LLC

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STATE OF HAWAII DEPARTMENT OF TRANSPORTATION 869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

DIR 1018 STP 8.3075

JADE T. BUTAY

DIRECTOR

Deputy Directors

LYNN A.S. ARAKI-REGAN

DEREK J. CHOW

ROSS M. HIGASHI

EDWIN H. SNIFFEN

November 19, 2020

Ms. Charlene Shibuya Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Ms. Shibuya:

Subject: Early Consultation

Kuikahi Residential Project Wailuku, Maui, Hawaii

Tax Map Key: (2) 3-5-002: 003 (portion)

The State of Hawaii, Department of Transportation (HDOT) has review the subject early consultation request and understands Kuikahi Properties, LLC is proposing to develop a new residential community to include residential uses such as multi-family, duplex, live-work, studio, and single-family units on an approximately 14.9-acre portion of land adjacent to Kuikahi Drive.

Direct access to the project site is proposed to be via two driveways on Kuikahi Drive which is under the County of Maui's jurisdiction. One of the project access driveways proposed to be located at the Kuikahi Drive and Kehalani Mauka Parkway intersection is approximately 0.5 miles away from the Kuikahi Drive intersection with Honoapiilani Highway (State Route 30).

HDOT has the following comments:

Airports Division (HDOT-A)

- 1. The Kuikahi Residential project location is approximately 3.9 miles from Kahului Airport. All projects within 5 miles from Hawaii State airports are advised to read the <u>Technical Assistance Memorandum (TAM)</u> for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.
- 2. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the <u>Code of Federal Regulations</u>, <u>Title 14</u>, <u>Part 77.9</u>, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. Construction equipment and staging area heights, including heights of temporary construction cranes, shall be included in the submittal. The form and criteria for submittal can be found at the following website: https://oeaaa.faa.gov/oeaaa/external/portal.jsp.

Highways Division (HDOT-HWY)

- 1. A Traffic Impact Assessment Report (TIAR) shall be prepared by a licensed professional engineer and submitted to HDOT with the draft Environmental Assessment (EA). The study area should include the Honoapiilani Highway (State Route 30) and Kuikahi Drive intersection.
- 2. There are other proposed developments in the region, including the Department of Hawaiian Home Land (DHHL) Puunani Homestead subdivision on an adjacent parcel (Tax Map Key: 3-5-002:002). The trip generation anticipated from these other projects in conjunction with the proposed project that could result in a cumulative adverse significant impact on Honoapiilani Highway traffic conditions. The draft EA and TIAR should include the potential cumulative impacts on traffic in the region.
- 3. We understand the traffic conditions are not typical due to COVID-19; and the analysis would need to rely, in part, on best available information, for example, the TIAR prepared for the DHHL project.
- 4. Describe the project development schedule, including phasing, and the landowner's future land use plans (vision) for the remainder of the parcel.
- 5. Describe the interconnection of the proposed internal bike and pedestrian pathways with those existing and proposed in the vicinity.
- 6. If a request for a reduction in the number of required parking spaces is being considered, specify the difference, the rationale for the reduction (e.g., reliance on alternative transportation), and include both trip generation scenarios in the TIAR.
- 7. Describe County roadway improvements included in the project, including the roundabout at the Kehalani Mauka Parkway and Kuikahi Drive intersection, and the Kehalani Mauka Parkway extension, as shown on the site plan. Clarify the jurisdiction of the proposed Kehalani Mauka Parkway extension.
- 8. The internal roadways appear to "stub-out" at the site development boundaries, suggesting there are future development plans for the remainder of the parcel. It is important for the Draft EA to describe the long-term master plan for the entire parcel, to provide context for the near-term project and disclose the potential cumulative environmental impacts associated with the entire master plan.
- 9. Describe proposed direct impacts to the State highway right-of-way, if applicable, including utility connections and use of stormwater drainage structures.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely

JADE T. BUTAY

Director of Transportation



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Jade Butay, Director State of Hawai'i Department of Transportation 869 Punchbowl Street Honolulu, Hawai'i 96813-5097

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i, DIR 1018, STP.8.3075

Dear Mr. Butay:

Thank you for your early consultation response letter dated November 19, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter:

AIRPORTS DIVISION (HDOT-A)

Response to Comment No. 1

We note the HDOT-A's comment regarding the proximity of the proposed project to the Kahului Airport. The Applicant confirms that its project team will review the Technical Assistance Memorandum for guidance in further developing the project.

Response to Comment No. 2

We acknowledge the HDOT-A's comment regarding the submittal of the FAA Form 7460-1 Notice of Proposed Construction or Alteration, pursuant to Code of Federal Regulations, Title 14, Part 77.9. As previously noted in your letter, the proposed project site is approximately 3.9 miles from Kahului Airport, a public use airport. The project site is beyond 20,000 feet of the airport and, as such, submittal of a FAA Form 7460-1 to the FAA is not anticipated.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

HIGHWAYS DIVISION (HDOT-HWY)

Response to Comment No. 1

Thank you for your comment. The Applicant confirms that a Traffic Impact Assessment Report (TIAR) is being prepared and that the TIAR will be submitted to the HDOT with its copy of the Draft Environmental Assessment (EA). The Applicant confirms that the TIAR will analyze the Honoapi'ilani Highway and Kuikahi Drive intersection.

Response to Comment No. 2

The Applicant confirms that the Draft EA and TIAR will include a discussion on the potential cumulative impacts on traffic in the region. The report includes a review of publicly available information for projects in the area.

Response to Comment No. 3

We acknowledge the Division's comment regarding traffic conditions due to the COVID-19 global pandemic. The Applicant and its traffic engineer confirm that the TIAR will analyze best available information, including information from the Department of Hawaiian Home Lands' proposed project in the area.

Response to Comment No. 4

The Applicant confirms that there are no future plans for the use of the remainder of the project parcel.

The proposed Kuikahi Residential project is anticipated to be developed as one (1) project with project infrastructure installed first and the vertical construction developed in phases. Preliminarily, the Applicant is proposing to develop the multi-family and live work units first and the limited single-family units to follow. The Applicant is limiting project plans to the proposed 14.9 acre area due to the uncertainty of the market and the economy. Any future development of additional lands in the area would undergo a separate review and permitting.

Response to Comment No. 5

The Applicant is proposing to connect the proposed pedestrian paths and bikeways within the residential development to the existing facilities within Kuikahi Drive. To achieve the pedestrian connectivity, the Applicant is proposing a crosswalk across Kuikahi Drive as there is an existing sidewalk on the North side of the road.

Response to Comment No. 6

The Applicant is not proposing an exemption for reduction of parking stalls for the project. The project will provide the number of stalls required by the County Code for the development.

Response to Comment No. 7

The Applicant's traffic engineering consultant has held discussions with the County of Maui, Department of Public Works (DPW) regarding the proposed roundabout on County roadway Kuikahi Drive. Discussions are ongoing in terms of preliminary design and layout of the roundabout, but the DPW is generally supportive of the roundabout. Further detail on the roundabout will be provided in the Draft EA. At the roundabout, the extension of the Kehalani Mauka Parkway into the project will serve as the main entrance into the project. A secondary access off Kuikahi Drive is proposed along the west boundary of the project. Internal project roadways are intended to remain private.

Response to Comment No. 8

Though the initial site plan for the proposed project included internal roadways which seemed to connect to potential future development, the Applicant confirms that there are no plans for future development of the remainder of the parcel. The site plan will be revised to indicate that the project roads will end within the project. It is noted that there is language within the Maui Island Plan which requires buffers from the Waikapu community for larger property. As such, any future development of the remaining lands, would also need to account for these buffer areas.

Response to Comment No. 9

Direct impacts to the State highway right-of-way will be studied and described in the TIAR and Preliminary Engineering Report prepared for the project. The Draft EA will include analysis of any potential impacts to right-of-ways and proposed mitigation measures.

Lastly, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

Jade Butay, Director September 7, 2021 Page 4

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

CC: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.

Stacy Otomo, Otomo Engineering, Inc.
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DAVID Y. IGE Governor

MIKE McCARTNEY
Director

DANIEL E. ORODENKER
Executive Officer

LAND USE COMMISSION

Department of Business, Economic Development & Tourism State of Hawai`i

December 2, 2020

Ms. Charlene Shibuya Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawai'i 96793

Dear Ms. Shibuya:

Subject:

Early Consultation Request for the Proposed Kuikahi Residential

Project

TMK No. (2) 3-5-002: 003 (por.)

Wailuku, Maui, Hawai'i

We are in receipt of your letter dated November 4, 2020, requesting our comments regarding the Kuikahi Residental Project ("Project"). We understand that the Project consists of an approximately 200-unit residential development consisting of multifamily, duplex, live-work, studio, and single-family units on an approximately 14.9-acre portion of the subject parcel. Minor commercial uses are also proposed in the livework units. All units are anticipated to be offered for sale at affordable prices to local residents.

We further understand that the Applicant is planning to apply for Chapter 2.97, Maui County Code ("MCC"), approval from the Maui County Council for the Project. Chapter 2.97, MCC, provides a process in which developers of 100 percent residential workforce housing may seek to fast track their developments by applying for County exemptions from this code, including Chapter 19.68 relating to State land use district boundary amendments for developments less than 15 acres in the Agricultural, Rural, and Urban Districts...

With this understanding, we have the following comments:

Ms. Charlene Shibuya December 2, 2020 Page 2

- Based on the representation of the Project Area on the Regional Location Map, we find that it is located within the State Land Use Agricultural District. Your letter erroneously states that "[t]he project site is designated for 'Urban' use by the State Land Use Commission...."
- The Applicant should clarify whether it intends to seek exemptions from 2) the district boundary amendment requirements as provided for under Chapter 2.97, MCC. If the Applicant does plan to request exemptions, the nature of such exemptions should be described in the Draft Environmental Assessment ("DEA"). We are aware of at least one instance where an applicant proposing an affordable housing development on Maui sought to exempt itself from filing an application for a district boundary amendment and the procedures associated with such an application, including the requirement that the Maui Planning Commission conduct a public hearing on the matter. Although in that case, the Maui County Council would have considered the boundary amendment, held hearings, taken evidence, acted on the boundary amendment, and imposed conditions of approval. we raised various concerns about the nature of the exemptions, including issues with proper notice and due process. We would have serious reservations if this Applicant followed a similar path.
- 3) In the event the Applicant pursues a district boundary amendment for the Project either with the Planning Commission or directly with the County Council, we would still have concerns about the deliberate parcelization of the Project. We believe it is highly unlikely the Project can be limited to under the 15-acre statutory threshold. We further believe that this acreage was chosen strictly to evade Land Use Commission ("LUC") consideration of the Project. As you know, developments often have impacts on areas of statewide concern, including, but not limited to, transportation infrastructure and school facilities. This Project does not appear to be any different. Once the Hawai'i Revised Statutes ("HRS") chapter 343 environmental review process concludes, there are no assurances that further consideration of these interests will occur before the County without the active participation of the State during the decision-making process. In light of the existing and ongoing residential developments of Wailuku Heights and Kehalani Mauka, respectively, there needs to be continuing analysis

Ms. Charlene Shibuya December 2, 2020 Page 3

of the potential cumulative and secondary impacts from the Project and these neighboring developments on State facilities and services. The LUC's quasi-judicial process would enable such interests as well as those of the County to be equally represented and considered before any decision is made on a development. Athough the provision of much needed affordable housing on Maui is laudable, we believe the misuse of HRS chapter 205 in this way compromises the statutory safeguards currently in place and, ultimately, the public's faith in the land use entitlement process. We request the Applicant reconsider its stance on the matter and be in accord with the spirit and intent of the State Land Use Law promulgated under HRS chapter 205.

If the Applicant chooses to adhere to the representation that the Project Area is under the 15-acre threshold, we request that the Applicant also agree or make clear that the surrounding areas will not be subject to the same parceling attempts. If not, we believe the Project Area should be processed as a larger parcel.

4) We request the DEA be provided to our office for review as soon as it becomes available.

We have no further comments to offer at this time. Should you have any questions or require further clarification, please feel free to call our office at 587-3822.

Sincerely,

Daniel E. Orodenker

Executive Officer



Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Daniel E. Orodenker, Executive Officer State of Hawai'i Department of Business, Economic Development, & Tourism Land Use Commission 235 South Beretania Street, Suite 406 Honolulu, Hawai'i 96813

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Mr. Orodenker:

Thank you for your early consultation response letter dated December 2, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter:

Response to Comment No. 1

We apologize for the error in our early consultation request noting that the project site is designated as "Urban" by the State Land Use Commission (SLUC), when in fact it is designated as "Agricultural". We will ensure that this information will be accurately represented in the Environmental Assessment document.

Response to Comment No. 2

Thank you for the comments related to the District Boundary Amendment (DBA) request. Since the project site is designated as "Agricultural" by the SLUC, the Applicant will be pursuing a DBA approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size. As the project site is less than 15 acres, we are proposing an exemption from Maui County Code (MCC) Chapter 19.68, State Land Use District Boundaries, MCC Chapter 19.510, Applications and Procedure and Article 8, Chapter 8, of the revised Charter of the County of Maui, as amended. The EA document and MCC Chapter 2.97 application will disclose the project intent to pursue these exemptions for the DBA action.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Response to Comment No. 3

We reviewed the comments provided and note that the Applicant does own additional lands adjacent to the proposed 14.9 acre project area. It is noted that the proposed project is intended to be a 100 percent affordable housing project. Further, the Applicant is intending to privately finance the project; no government funds or tax credits will be sought for the project implementation. Given the current global pandemic and the uncertainty of future economic outlook, the Applicant determined that they would like to proceed with the limited scope of the project. The Applicant also recognizes that any future residential and/or commercial development, beyond the 14.9 acre project site, will require separate environmental reviews and land use entitlement actions. The Applicant has no plans in the forseeable future for the development of the additional lands in the area and it is anticipated that should the Kuikahi residential project receive approvals, that it will be a multi-year project.

In terms of items of Statewide importance, the Applicant is intending to abide by the State Department of Education's (DOE) assessment for the residential units, as it recognizes that the proposed project will likely include school aged children. Further, the Applicant and its consultants are in discussions with the State Department of Transportation (SDOT) as there may be anticipated improvements at the Kuikahi Drive and Honoapiilani Highway intersection as determined by a Traffic Impact Analysis Report. In addition to being reviewing agencies during the environmental review process, both the DOE and the SDOT are reviewing agencies on building permits related to residential development. As such, there is a mechanism in place through the County's Building Permit process, for follow through on commitments related to State agencies.

The Applicant believes that the project will have multiple opportunities for public review and has also instituted a community outreach program for the project. The community stakeholders that are included in the outreach program include surrounding landowners and homeowner associations, Maui County Councilmembers as well as residents with cultural and historical background. The County Council review of the Chapter 2.97 application will also be agendized and open to the public.

Response to Comment No. 4

We confirm that a copy of the Draft EA for the proposed project will be provided to the Land Use Commission's office for review as soon as it is available.

Daniel E. Orodenker, Executive Officer September 2, 2021 Page 3

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

Linda Munsell, County of Maui, Department of Housing and Human Concerns CC:

Doyle Betsill, Kuikahi Properties, LLC K:\DATA\WV Regenesis\Wailuku AH\Applications\ECL\Response Letters\SLUC Response.docx

MICHAEL P. VICTORINO Mayor

ERIC A. NAKAGAWA, P.E. Acting Director

SHAYNE R. AGAWA, P.E. Deputy Director

MICHAEL P. RATTE Solid Waste Division

SCOTT R. ROLLINS, P.E. Wastewater Reclamation Division

TAMARA L. FARNSWORTH Environmental Protection & Sustainability Division





COUNTY OF MAUI DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

2050 MAIN STREET, SUITE 2B WAILUKU, MAUI, HAWAII 96793

December 7, 2020

Munekiyo Hiraga Attn: Charlene Shibuya 305 High Street, Suite 104 Wailuku, Hawaii 96793

SUBJECT:

KUIKAHI RESIDENTIAL PROJECT EARLY CONSULTATION REQUEST TMK (2) 3-5-002:003 (POR.), WAILUKU

We reviewed the subject application and have the following comments:

- Solid Waste Division comments:
 - a. None
- 2. Wastewater Reclamation Division (WWRD) comments:

This letter is response to your Early Consultation Request dated 11-4-2020. It is intended to provide information describing the nature and limitation of the wastewater service that could be provided to the subject project. Our review of your request has concluded that:

- a. The subject project proposed to be developed by Kuikahi Properties,
 LLC consists of approximately 120 condominium units, 34 duplex units,
 16 live-Work units, 28 studio units and 6 single family residences.
- b. Estimated wastewater flows for the project were not included in your request. We attempted to assess the proposed project based on your included description. We projected that the development could produce approximately 55,000 gpd of wastewater. At the current time, the WWRF has adequate capacity to accept and treat the expected flows from the project.
- c. Connection to the County wastewater system would be on Kuikahi Drive. Flows would follow Kuikahi Drive, Waiale Road and Lower Main Street to the Wailuku Wastewater Pump Station (WWPS). The Wailuku WWPS force main discharges at the Wailuku/Kahului WWRF.

Munekiyo Hiraga Attn: Charlene Shibuya December 7, 2020

Page 2

- d. Capacity in the collection system is not available for this project until the Lower Main Street Sewer Upgrade is completed. The project has been designed and bids opened. It is scheduled to begin construction in early 2021 with completion expected before the end of the year.
- e. The Wailuku Wastewater Pump Station currently has adequate capacity to accommodate this project.
- f. Wastewater treatment for the subject project would be provided by the Wailuku/Kahului Wastewater Reclamation Facility (WWRF). This facility is owned and operated by the County of Maui and currently processes approximately 5.8 million gallons per day (mgd) of wastewater. To date the County has allocated 6.9 mgd of the plants 7.9 mgd capacity.
- g. The project will be required to construct a sewer service manhole on the property prior to connection to the County system.
- h. Any businesses within the project will be required to install pretreatment devices (grease interceptor etc.) if applicable.
- i. Note that capacity cannot be guaranteed until building permits are issued. There is always a possibility that adequate capacity may not be available if construction is delayed, a significant number of other projects are developed, or regulatory conditions change.
- Wastewater contribution calculations are required before building permit is issued.
- k. Developer is not required to pay assessment fees for this area at the current time.
- I. Developer is required to fund any necessary off-site improvements to collection system and wastewater pump stations.
- m. Show or list minimum slope of new sewer laterals.
- n. Indicate on the plans the ownership of each easement (in favor of which party). Note: County will not accept sewer easements that traverse private property.
- Non-contact cooling water and condensate should not drain to the wastewater system.

If you have any questions regarding this letter, please contact Shayne Agawa at 270-8230.

Sincerely,

Digitally signed by Eric Nakagawa DN cn=Eric Nakagawa, o=County of Maui ou=Director of Environmental Management, email=eric nakagawa@co mau ih ius, c=US Date: 2020 12 08 16 19 45 -10'00'

ERIC A. NAKAGAWA, P.E. Director of Environmental Management



Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Eric Nakagawa, Director County of Maui Department of Environmental Management 2050 Main Street, Suite 2B Wailuku, Hawai'i 96793

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Mr. Nakagawa:

Thank you for your early consultation response letter dated December 7, 2020 on the subject project. We would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to comments noted in your letter.

SOLID WASTE DIVISION

We acknowledge that the Solid Waste Division has no comments on the proposed project.

WASTEWATER RECLAMATION DIVISION (WWRD)

We offer the following information in response to each of the WWRD's comments:

- a. We note the WWRD's comment on the number of units at the proposed project.
- b. Since the project is in its early planning and development phase, estimated wastewater flows for the project were not included in our early consultation request; however, this information will be included in a Preliminary Engineering and Drainage Report (PEDR) in the Environmental Assessment (EA). We note

Maui: 305 High Street, Suite 104 * Wailuku, Hawaii 96793 * Tel: 808.244.2015 * Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

the WWRD's estimated projection of 55,000 gallons per day (gpd) of wastewater, and acknowledge that the Wailuku/Kahului Wastewater Reclamation Facility (WWRF) currently has adequate capacity to accept and treat the expected flows (55,000 gpd) from the project.

- c. We acknowledge the WWRD's confirmation that the project would connect to the County's wastewater system through Kuikahi Drive and would connect to the Wailuku Wastewater Pump Station (WWPS), which ultimately discharges at the Wailuku/Kahului WWRF.
- d. We note the WWRD's comment regarding the construction of the Lower Main Street Sewer Upgrade. The Applicant does not anticipate to start construction for the proposed project until various entitlement and construction permitting approvals are obtained. The Applicant and its civil engineering consultant will continue to coordinate with the WWRD as the project proceeds.
- e. We acknowledge the WWRD's comment that the WWPS currently has adequate capacity to accommodate the proposed project.
- f. We acknowledge the WWRD's comment confirming the Wailuku/Kahului Wastewater Reclamation Facility owned and operated by the County will provide service to the project. And that the facility processes approximately 5.8 million gallons per day (gpd) of wastewater with an allocation to date of 6.9 million gpd of the plant's 7.9 million gpd capacity.
- g. The Applicant will construct a sewer service manhole on the property prior to connecting to the County's system.
- h. We note that the WWRD will require that any businesses operating at the project site will be required to install pre-treatment devices, if applicable.
- i. We note that capacity at the WWPS and Wailuku/Kahului WWRF cannot be guaranteed until building permits for the proposed project are issued.
- j. Wastewater contribution calculations will be submitted prior to building permit issuance.
- k. We note the WWRD's confirmation that the Applicant is not required to pay assessment fees for this area at the current time.
- I. We note the WWRD's confirmation that the Applicant is required to fund necessary off-site improvements to collection system and wastewater pump stations.
- m. Project plans will include information related to minimum slope of new sewer laterals.

Eric Nakagawa, Director September 7, 2021 Page 3

- n. The Applicant will include information related to ownership of each easement on the project plans and acknowledge that the County will not accept sewer easements that traverse private property.
- o. Non-contact cooling water and condensates will not be directed into the County's wastewater system.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC Stacy Otomo, Otomo Engineering, Inc.

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MICHAEL P. VICTORINO Mayor

DAVID C. THYNE Fire Chief

BRADFORD K. VENTURA

Deputy Fire Chief





DEPARTMENT OF FIRE & PUBLIC SAFETY

FIRE PREVENTION BUREAU COUNTY OF MAUI 313 MANEA PL. WAILUKU, HI 96793

November 12, 2020

Munekiyo Hiraga Attn: Charlene Shibuya, Senior Associate 305 High St. Suite 104 Wailuku, HI 96793

SUBJECT: EARLY CONSULTATION REQUEST

PROPOSED KUIKAHI RESIDENTIAL PROJECT

TMK: (2) 3-5-002:003(POR) WAILUKU, MAUI, HAWAII

Dear Charlene Shibuya,

Thank you for allowing our office to provide comment on the proposed project. As per your request, comments are provided below:

- There are no objections in regards to the information provided as part of the Early Consultation Request for the Proposed Kuikahi Residential Project.
- Our office does reserve the right to comment on the proposed project during the building permit review process should detailed plans for this project be routed to our office for review. At that time, fire apparatus access, water supply for fire protection, and fire and life safety requirements associated with the subject project will be formally reviewed.

If there are any questions or comments, please feel free to contact me at (808) 876-4693 or by email at paul.haake@mauicounty.gov.

Sincerely,

Paul Houke

Paul Haake, Captain - Fire Prevention Bureau



Mark Alexander Roy

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo

September 7, 2021

Ryan Otsubo, Captain County of Maui Department of Fire & Public Safety Fire Prevention Bureau 313 Manea Place Wailuku, Hawai'i 96793

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Captain Otsubo:

Thank you for your Department's early consultation response letter dated November 30, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to comments noted in your letter.

We appreciate the Department's confirmation that there are no objections to the information provided in the Early Consultation Request for the proposed project. The Applicant acknowledges the Department's right to comment on the proposed project during the building permit review process, and confirms that detailed project plans will be provided to the Department for review and approval.

Lastly, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

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Ryan Otsubo, Captain September 7, 2021 Page 2

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC K:\DATA\WV Regenesis\Wailuku AH\Applications\ECL\Response Letters\Fire.Response.docx

MICHAEL P. VICTORINO Mayor

KARLA H. PETERS Director

MARY A. KIELTY Deputy Director





DEPARTMENT OF PARKS AND RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawai'i 96793 Main Line (808) 270-7230 / Facsimile (808) 270-7942

November 18, 2020

Charlene Shibuya, Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, HI 96793

Dear Ms. Shibuya:

SUBJECT: EARLY CONSULTATION REQUEST FOR THE PROPOSED KUIKAHI RESIDENTIAL PROJECT; TMK: (2) 3-5-002:003 (por.); WAILUKU,

MAUI, HAWAII

Thank you for the opportunity to review the proposed Kuikahi Residential project. In review of the project, we note that the applicant is currently proposing to develop 204 affordable housing units and is planning to apply for Maui County Code 2.97 approval from the Maui County Council for the proposed development.

The Department of Parks and Recreation looks forward to reviewing the final application for compliance with Maui County Code 18.16.320. We have no further comments at this time.

Should you have any questions or concerns, please feel free to call me, or Samual Marvel, Chief of Planning and Development, at (808) 270-6173.

Sincerely,

KARLA H. PETERS

Director of Parks and Recreation

Samual Marvel, Chief of Planning and Development

KHP:SM:csa



Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng

Michael T. Munekiyo

September 7, 2021

Karla H. Peters, Director County of Maui Department of Parks and Recreation 700 Hali'a Nakoa Street, Unit 2 Wailuku, Hawai'i 96793

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. Peters:

Thank you for your early consultation response letter dated November 18, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we acknowledge that the Department has no comment on the proposed project at this time.

Furthermore, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC

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MICHAEL P. VICTORINO
Mayor
MICHELE CHOUTEAU MCLEAN, AICP
Director
JORDAN E. HART

JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

COUNTY OF MAUI ONE MAIN PLAZA 2200 MAIN STREET, SUITE 315 WAILUKU, MAUI, HAWAII 96793

December 31, 2020

Ms. Charlene Shibuya Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Dear Ms. Shibuya:

SUBJECT: REQUEST FOR EARLY CONSULTATION REGARDING THE PREPARATION OF AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED KUIKAHI AFFORDABLE RESIDENTIAL PROJECT, LOCATED IN WAILUKU, MAUI, HAWAII; TMK: (2) 3-5-002:003 (POR.)

(RFC 2020/0164)

The Department of Planning (Department) is in receipt of the proposed Kuikahi Affordable Residential Housing Project (Project) Request for Early Consultation in preparation of the Draft Environmental Assessment (DEA). The Department understands from your letter dated November 4, 2020, that "as a 100 percent affordable housing development, the Applicant is planning to apply for Chapter 2.97, Maui County Code (MCC) approval from the Maui County Council for the proposed development. Though the proposed project will utilize private funds, State and County lands are anticipated to be used for improvements to Honoapiilani Highway and Kuikahi Drive, respectively. The use of State and County lands triggers compliance with the environmental review requirements of Hawaii Revised Statutes (HRS), Chapter 343. Accordingly a DEA will be prepared pursuant to Chapter 343, HRS and Chapter 11-200.1, Hawaii Administrative Rules (HAR) to evaluate the technical characteristics and potential environmental impacts of the proposed project, as well as to advance findings and mitigative measures relative to the project." The Department of Housing and Human Concerns (DHHC) will be the Approving Authority for the Chapter 343, HRS EA.

The project will be 100 percent affordable and comprised of approximately 200 residential units, including a variety of residence types such as multi-family, duplex, live-work, studio, and single-family units on an approximately 14.9 acre portion of TMK parcel. The 200 units are targeted to families earning at or below 120 percent of the Area Median Index (AMI). In addition to the residential units, internal roadways, sidewalks, bike paths, landscaping, spot parks, drainage improvements and utility connections are proposed as part of the project.

Ms. Charlene Shibuya December 31, 2020 Page 2

Adequate off-street parking stalls will be provided for the project. Access to the project is proposed via two driveways along Kuikahi Drive, a roundabout at the east portion of the project area, across from Kehalani Mauka Parkway, and the other on the west portion of the project site below the existing water tank. The Department offers the following comments:

- 1. The proposed project site is in the Puunani planned growth area outlined in the Maui Island Plan (MIP) on page 8-21. Located south of the Kehalani Master Development and below Wailuku Heights, the project appears to be outside of the 200-foot greenbelt buffer adjacent to the Honoapiilani Highway and outside of the 500 foot greenbelt along the Puunani planned growth area's southern extent providing a separation between the Waiolani community and Wailuku. Verify that the project is outside of these greenbelt buffers by including the buffers on a project site map.
- 2. Exhibit 1 attached to this comment letter is a copy of the Puunani planned growth area narrative from the MIP. The original intent of the Puunani planned growth area as stated in the MIP was "Pu'unani is a residential expansion of the existing southern boundary of Wailuku Town. It is intended that infrastructure development be coordinated with neighboring developments including Kehalani, Wai'ale and Waikapu Tropical Plantation Town. The urban portion of the growth area will be comprised primarily of approximately 450 multifamily units and commercial and public/quasi-public uses. The rural component will be comprised of low-density residential lots that will provide for a transitional zone from the high-density, multifamily component of the growth area as well as Wailuku to the north." Discuss how this project comports with the MIP for the Puunani planned growth area and the distribution of urban and rural components within this growth area.
- 3. Under the heading <u>Regulatory Considerations</u> in your letter of November 4, 2020, you state that the project site is designated "Urban" by the State Land Use Commission. The Department understands that this project site is still designated "Agriculture." Verify the State Land Use Boundary designation for this project parcel. If as suspected, the project area of 14.9 acres is designated "Agriculture", the Applicant should request a District Boundary Amendment (DBA). Regarding the exemption from the application process and Maui Planning Commission review requirements of Chapter 19.68, MCC referring to State Land Use District Boundaries, the Department advises that the Applicant request a DBA from the County Council as part of their affordable housing review pursuant to Chapter 2.97 of the MCC.

Ms. Charlene Shibuya December 31, 2020 Page 3

- 4. The Department notes that any future urban development on the adjacent lands in the Puunani planned growth area will require a full DBA with State Land Use Commission review.
- 5. The conceptual site plan indicates related improvements such as internal roadways, sidewalks, bike paths, landscaping, spot parks, drainage improvements, utility connections, and two entrances from Kuikahi Drive. The build out of a roundabout at the intersection of Kuikahi Drive and Kehalani Mauka Parkway is an interesting concept and should be explored as part of the final project. Review the engineering of this roundabout in the DEA as the slope of Kuikahi Drive must be taken into consideration. Pedestrian/bike paths should be included in the final design and built to connect to future developments. Internal sidewalks are excellent providing connectively throughout the project. The pedestrian and bike path along the southern edge of Kuikahi Drive.
- 6. The Department also comments on the extension of Kehalani Mauka Parkway south of Kuikahi Drive. What is your intended roadway name for this road into the project? Also, this roadway should contain similar sidewalks and a shared use path/bikeway that already exists on the northern side of Kuikahi Drive to maintain consistency with the travel experience.
- 7. The Department would also like the Applicant to consider having adequate storage space on-site for lawn and other equipment.

Thank you for the opportunity to comment on the preparation of the DEA for the Kuikahi Residential Project. Should you require further clarification, please contact Staff Planner Kurt Wollenhaupt at kurt.wollenhaupt@mauicounty.gov or at (808) 270-1789.

Sincerely,

MICHELE MCLEAN, AICI

Planning Director

xc: Jordan Hart, Deputy Planning Director (PDF)

Clayton 1. Yoshida, AICP, Planning Program Administrator (PDF)

John S., Rapacz, Planning Program Administrator (PDF)

Kurt F. Wollenhaupt, Staff Planner (PDF)

Kathleen Aoki, Administrative Planning Officer (PDF)

Pam Eaton, Planning Program Administrator (PDF)

Paul Critchlow, Staff Planner (PDF)

Charlene Shibuya, Munekiyo Hiraga (PDF)

Ms. Charlene Shibuya December 31, 2020 Page 4

Project File
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Pu'unani

The Pu'unani planned growth area is intended to be a mixed-use project located at the southwest edge of Wailuku. This urban and rural expansion is located south of Kehalani below Wailuku Heights and is bounded to the east by Honoapi'ilani Highway. The growth area will be buffered by a 200-foot greenbelt along its eastern edge and adjacent to Honoapi'ilani Highway. Additionally, a 500-foot greenbelt along the area's southern extent shall provide a separation between the Waiolani community and Wailuku. The greenbelt, greenway, and rural lands are intended to provide separation between Wailuku and Waikapu, and to provide a visual relief by creating a lower-density residential pattern than surrounding communities. This planned growth area will mark the southern boundary of Wailuku.

Planned Growth Area Rationale

Pu'unani is a residential expansion of the existing southern boundary of Wailuku Town. It is intended that infrastructure development be coordinated with neighboring developments including Kehalani, Wai'ale and Waikapū Tropical Plantation Town. The urban portion of the growth area will be comprised primarily of approximately 450 multifamily units and commercial and public/quasi-public uses. The rural component will be comprised of low-density residential lots that will provide for a transitional zone from the high-density, multifamily component of the growth area as well as Wailuku to the north. The precise rural residential densities and unit count for the rural component of the project will be determined at the time of zoning.

The area is currently zoned for agricultural use, and water and wastewater infrastructure, as well as transit access are in place. The Pu'unani planned growth area is depicted on Figure 8-1. Table 8-7 provides planning guidelines for this planned growth area:

Table 8 - 7: Pu'unani Planned Growth Area

Maur County General Plan 2010

Background Inform	ation:		
Project Name:	Pu`unani	Directed Growth Map #:	
Type of Growth:	Urban & Rural Expansion	Gross Site Acreage:	209 Acres
Planning Guidelines			
Dwelling Unit Count	: Approximately	Residential Product Mix:	MF/VMX - 64 Acres
	Urban - 450 Units		Rural - 143 Acres
	Rural - To be determined ⁸		
Not Residential Den	sity: Urban - 9-12 du/acre	Parks and Open Space%9:	≥ 36%
	Rural - To be determined		
		Commercial:	Neighborhood Serving

8-21

Maui Island Plan



Additional units may be permitted through a transfer of development rights program or to provide affordable housing in excess of what is required by law. Unit counts may be further defined through the entitlement process in response to infrastructure and environmental constraints.

environmental constraints.

The distinct boundaries of the parks and open space, specific location of the recreational uses, and the precise amenities will be further defined during the Wailuku - Kahului Community Plan Update and the project review and approval process.



Karlynn K. Fukuda

Mark Alexander Roy VICE PRESIDENT

Tessa Munekiyo Ng

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Michele Chouteau McLean, Director County of Maui Department of Planning 2200 Main Street, Suite 315 Wailuku, Hawai'i 96793

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. McLean:

Thank you for your early consultation response letter dated December 31, 2020 with the Department of Planning's consolidated comments on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in each letter:

Response to Comment No. 1

The Applicant confirms that the Draft EA will include an additional figure depicting the 500-foot greenbelt along the Maui Island Plan's planned growth area in relation to the project site to verify that the development is outside of the greenbelt buffer. The project site is located more than 200 feet away from the Honoapi'ilani Highway.

Response to Comment No. 2

We note the Department's comments regarding the Pu'unani planned growth area of the Maui Island Plan. The proposed Kuikahi Affordable Housing project consists of the development of 204 residential units for Maui's low-income families and will also include a minor live-work component within the project itself. A small portion of the project will include single-family residential lots (six (6) lots total). Additionally, the project is outside of the 500-foot buffer area from the Waiolani community, separating the development from Waikapū. As such, the proposed project is in alignment with the intention of the Pu'unani planned growth area. Additional discussion as it relates to the Pu'unani growth area will be included in the Draft EA.

Maui: 305 High Street, Suite 104 * Wailuku, Hawaii 96793 * Tel: 808.244.2015 * Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Michele Chouteau McLean, Director September 7, 2021 Page 2

Response to Comment No. 3

We apologize for the error in our consultation letter noting that the project site is designated "Urban" by the State Land Use Commission (SLUC). The project site is designated "Agricultural" and, as such, the Applicant will be pursuing a District Boundary Amendment (DBA) approval from the Maui County Council in addition to its request to the Council for affordable housing review, pursuant to Chapter 2.97, Maui County Code (MCC).

Response to Comment No. 4

We acknowledge the Department's comment that any future urban development on adjacent lands in the Pu'unani planned growth area will require a full DBA with SLUC review. It is noted that there are no future plans to develop the area beyond the proposed project site.

Response to Comment No. 5

We note the Department's comments regarding the conceptual site plan, specifically the roundabout on Kuikahi Drive and inclusion of pedestrian/bike paths. The Applicant and the project's traffic engineering consultant are in discussions with the Department of Public Works regarding the possible roundabout relative to engineering and design options. The Applicant confirms that internal sidewalks and bike paths will be developed to ensure connectivity between the proposed project and existing, surrounding developments.

Response to Comment No. 6

Since the proposed action is in its conceptual design phase, the Applicant has not developed possible roadway names for the extension of Kehalani Mauka Parkway; however, as the project's design progresses, an application with the Department of Public Work's Commission on Naming Streets, Parks, and Facilities will be filed for review and approval of the proposed street name. Additionally, we note the Department's recommendation to include sidewalks and shared use paths/bikeways on this road.

Response to Comment No. 7

Thank you for your comment regarding inclusion of having adequate storage space onsite for lawn and other equipment at the proposed project. This suggestion has been shared with the Applicant and its design team for consideration. Michele Chouteau McLean, Director September 7, 2021 Page 3

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft EA for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

Linda Munsell, County of Maui, Department of Housing and Human Concerns CC:

Doyle Betsill, Kuikahi Properties, LLC

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.

Stacy Otomo, Otomo Engineering, Inc.
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MICHAEL P. VICTORINO MAYOR

OUR REFERENCE YOUR REFERENCE

POLICE DEPARTMENT

COUNTY OF MAUI

55 MAHALANI STREET WAILUKU, HAWAII 96793 (808) 244-6400 FAX (808) 244-6411



TIVOLI S. FAAUMU CHIEF OF POLICE

DEAN M. RICKARDDEPUTY CHIEF OF POLICE

November 13, 2020

Ms. Charlene Shibuya Senior Associate Munekiyo & Hiraga, Inc. 305 High Street, Suite 104 Wailuku, HI 96793

Dear Ms. Shibuya:

SUBJECT:

Early Consultation Request for the Proposed Kuikahi Residential

Project; TMK No. (2) 3-5-002 (por.); Wailuku

We have received your letter of November 5, 2020 requesting comments on the above mentioned project. The information was assigned to our Community Policing Unit. Enclosed is a copy of their findings that we would like to document as our comments. Thank you for giving us an opportunity to provide our comments.

Very truly yours,

Assistant Chief John Jakubczak

for: Tivoli S. Faaumu Chief of Police

c: Michele Chouteau McLean, Dept. of Planning Linda Munsell, Dept. of Housing and Human Concerns TO : TIVOLI FAAUMU, CHIEF OF POLICE, COUNTY OF MAUI

VIA : CHANNELS John Jakubczak TO BE DEAFTED AND SUBMITTED ASSISTANT Chief ON GEPT. LETTERHEAD TO

FROM : SHAWN MIDA, POLICE OFFICER III, COMMUNITY

POLICING

SUBJECT : RESPONSE TO A REQUEST FOR COMMENTS REGARDING

THE PROPOSED KUIKAHI RESIDENTIAL PROJECT

This communication is submitted as a response to a request for comments by Charlene SHIBUYA, Senior Associate.

PROJECT : RESPONSE TO A REQUEST FOR COMMENTS REGARDING

PROPOSED KUIKAHI RESIDENTIAL PROJECT

TMK 1: TMK No. (2)3-5-002:003 (por.); WAILUKU, MAUI, HAWAII

RESPONSE:

In review of the submitted construction plans, concerns from the Police perspective are upon the safety of pedestrian and vehicular movement.

It is unknown at this time if any equipment will be stored on site, as it will be a decision made by the project contractor. The project will need to meet the minimal standards set forth by county codes and state laws. I suggest if the roads will be temporary closed due to one lane (alternating traffic) the project manager utilize flag men to conduct traffic control and have all proper signage posted along the routes during construction.

There are no objections to the upcoming construction project at this time.

Submitted for your perusal,

Shawn MIDA, E#15285

Police Officer III / Community Policing

11/12/20 @ 1430 hrs.

NOTED:

Sgt. James E. Terry E#12125

Wailuku Patrol Division

11/12/2020 @ 1650 Hours

11.13.20 0700



Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo

September 7, 2021

Acting Chief Dean M. Rickard County of Maui Police Department 55 Mahalani Street Wailuku, Hawai'i 96793

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Chief Rickard:

Thank you for your Department's early consultation response letter dated November 13, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter.

We note the Department's concern regarding the safety of pedestrian and vehicular movement at the project site. As stated in your letter, the project's contractor will ensure that minimal standards set forth by County codes and State laws are met. The Applicant and its traffic engineer have and continue to coordinate with the State Department of Transportation and Department of Public Works to determine necessary traffic control measures during project construction (i.e., lane closures, signage, etc.) and will implement these measures accordingly. We acknowledge the Department's confirmation that there are no objections to the project's construction at this time.

Lastly, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Acting Chief Dean M. Rickard September 7, 2021 Page 2

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

CC: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC

Tyler Fujiwara, Austin Tsutsumi & Associates

Stacy Otomo, Otomo Engineering, Inc.
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MICHAEL P. VICTORINO Mayor

ROWENA M. DAGDAG-ANDAYA Director

> JORDAN MOLINA Deputy Director

GLEN A. UENO, P.E., L.S. Development Services Administration

RODRIGO "CHICO" RABARA, P.E. Engineering Division

JOHN R. SMITH, P.E. Highways Division

Telephone: (808) 270-7845 Fax: (808) 270-7955





COUNTY OF MAUI DEPARTMENT OF PUBLIC WORKS 200 SOUTH HIGH STREET, ROOM 434 WAILUKU, MAUI, HAWAII 96793

December 29, 2020

Ms. Charlene Shibuya, Senior Associate MUNEKIYO HIRAGA 305 High Street, Suite 104 Wailuku, Maui, Hawaii 96793

Dear Ms. Shibuya:

SUBJECT: EARLY CONSULTATION REQUEST FOR THE PROPOSED KUIKAHI RESIDENTIAL PROJECT; TMK: (2) 3-5-002:003 (POR.)

We reviewed the early consultation request and have the following comments:

Comments from the Highways Division:

1. Highways Division requests that all roadways and drainage facilities associated with this project remain private in-perpetuity.

Comments from the Engineering Division:

- 2. Upon submittal of the drainage report, please ensure compliance with the following:
 - Title MC-15, Chapter 4, "Rules for the Design of Storm Drainage Facilities in the County of Maui";
 - Title MCC-15, Chapter 111, "Rules for the Design of Storm Water Treatment Best Management Practices"; and
 - Title 20, Chapter 20.08, "Soil Erosion and Sedimentation Control".
- 3. The project drainage report should demonstrate that post-development discharge along the property line will not adversely affect downstream properties and conveyances. Provide analysis of pre-developed and post-

developed conditions for discharge locations along the property line and the resulting effects of post-developed conditions.

- 4. Identify any adjacent drainageways in both the report and project construction plans. Include information regarding the reserved flooded width, flow rates, and conveyance calculations.
- 5. Provide information on offsite runoff if it enters the project site. Please note that the recurrence interval is based on the drainage area and not the developed area. Review the drainage area contributing to the project site and select the criteria and design methodology accordingly.
- 6. Please provide the following information with the project drainage report:
 - Verification that the proposed drainage improvements are in compliance with any existing development master plans;
 - Flooded width calculations for roadways;
 - Hydraulic grade lines on drainline profiles;
 - Backwater calculations; and
 - Calculations for sizing of all drainage systems (i.e., bioretention strips, underground detention systems, and detention basin).
- Our Department is currently evaluating options to handle storm runoff from the Wailuku Heights Extension Unit 1 Subdivision that presently discharges into the reservoir located above this proposed project. Preliminary options being considered involve constructing a new detention basin downstream of the Wailuku Heights Extension Unit 1 Subdivision. Please contact the Department of Public Works, Engineering Division to discuss in more detail.

If you have any questions regarding the above, please contact Wendy Kobashigawa at 270-7745 or wendy.kobashigawa@co.maui.hi.us.

- 8. Submit traffic impact analysis report (TIAR) for review and comment.
- 9. Consult with the Engineering Division's Engineering Services Section to discuss parameters of the TIAR, prior to commencement of a study.
- Confirm whether any roadways proposed will remain under private ownership or if the intent is to dedicate such roadways to the County of Maui.

- 11. Sidewalks of six (6) feet wide will be required along roadways fronting the project.
- 12. Sidewalks of five (5) feet wide will be required on both sides of roadways within the project limits that are to be dedicated to the County of Maui.
- Crosswalks and ramps at all intersections across all approaches. Ramps shall comply to the current Americans with Disabilities Act Accessibility Guidelines (ADAAG) to the maximum extent feasible.
- 14. A turn lane will be required to serve the proposed conventional intersection (west access to project) on Kuikahi Drive, as shown in Figure 2 attached to the early consultation letter.
- 15. Sight distances on Kuikahi Drive should be based on the average operating speeds. This data should be included in the project's TIAR.
- 16. Ensure that the proposed roundabout at the east access to the project will accommodate larger vehicles anticipated to serve the area.
- 17. Rectangular Rapid Flashing Beacons are required for crosswalks across Kuikahi Drive at the proposed roundabout.

Please call Jordan Molina at 270-7845 if you have any questions regarding this letter.

Sincerely,

FOR ROWENA M. DAGDAG-ANDAYA

Dorlan Molin

Director of Public Works

RMDA:JM:da

xc: Highways Division

Engineering Division

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Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo

September 7, 2021

Rowena M. Dagdag-Andaya, Director County of Maui Department of Public Works 200 South High Street, 4th Floor Wailuku, Hawaii 96793

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. Dagdag-Andaya:

Thank you for your early consultation response letter dated December 7, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter:

HIGHWAYS DIVISION

We acknowledge that the Highways Division requests that all roadways and drainage facilities associated with the project remain private in perpetuity. It is the project's intent to keep all internal roadway and drainage facilities privately owned and maintained.

ENGINEERING DIVISION

- 1. A drainage report will be included with the Draft Environmental Assessment. The civil engineering consultant will ensure the drainage report submittal complies with the Maui County Code and administrative rules concerning the Design of Storm Drainage Facilities, Design of Storm Water Treatment Best Management Practices, and Soil Erosion and Sedimentation Control.
- 2. As applicable, the report will contain necessary information requested concerning:
 - Post-development discharge along the property line not adversely affecting downstream properties and conveyances;
 - Analysis of discharge locations along the property line on resulting effects of the development;

Maui: 305 High Street, Suite 104 * Wailuku, Hawaii 96793 * Tel: 808.244.2015 * Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

- Identifying adjacent drainageways in the report and the project construction plans including information regarding the reserved flooded width, flow rates, and conveyance calculations;
- Offsite runoff if it enters the project site. The recurrence interval will be based on the drainage area contributing to the project site and not the developed area for selecting the appropriate criteria and design methodology;
- Verifying that the proposed drainage improvements are in compliance with any existing development master plans;
- Flooded width calculations for roadways;
- Hydraulic grade lines on drainline profiles;
- Backwater calculations; and
- Calculations for sizing of all drainage systems (i.e. bioretention strips, underground detention systems, and detention basins).
- 3. On February 25, 2021, as requested by the Engineering Division, we met with the Deputy Director to initiate discussions on evaluating alternatives to handle storm runoff from the Wailuku Heights Extension Unit 1 Subdivision that presently discharges into the reservoir located in and above the proposed project's property. The Applicant expressed his willingness to further discuss more details on options proposed by your Department's design consultant when they become available.
- 4. A Traffic Impact Analysis Report (TIAR) has been prepared and will be included with the Draft Environmental Assessment for review and comment by the Department. The traffic engineering consultant met with the Engineering Division to discuss parameters of the TIAR, prior to preparing the study.
- 5. Roadways internal to the proposed project will remain private. For the proposed roundabout at the intersection of Kuʻikahi Drive and Kehalani Mauka Parkway, additional road widening right-of-way at the project entrance will be dedicated to the County of Maui.
- 6. With the 2.97 Residential Workforce Housing application, an exemption will be requested for sidewalks along the Ku'ikahi Drive frontage. Proposed in lieu of the sidewalk will be a 10-foot wide separated shared use path to connect with the project's internal pedestrian and bike path.
- 7. The internal roadways will remain private with sidewalks on both sides.

- 8. Crosswalks and ramps will be provided at the Kuʻikahi Drive and Kehalani Mauka Parkway intersection as well as internal intersections to ensure compliance with the current Americans with Disabilities Act Accessibility Guidelines (ADAAG).
- 9. A turn lane will be provided at the intersection of Ku'ikahi Drive and the west access driveway.
- 10. Sight distances on Ku'ikahi Drive will be based on the average operating speeds.
- 11. The proposed roundabout at the east access to the project will be designed to accommodate larger vehicles anticipated to serve the area.
- 12. Per the Department's requirements, Rectangular Rapid Flashing Beacons will be provided for crosswalks across Ku'ikahi Drive at the proposed roundabout.

Furthermore, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agriculture" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Verv truly yours.

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC Stacy Otomo, Otomo Engineering, Inc. Tyler Fujiwara, Austin Tsutsumi & Associates

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MICHAEL P. VICTORINO Mayor

MARC I. TAKAMORI Director

MICHAEL B. DU PONT

Deputy Director





DEPARTMENT OF TRANSPORTATION

COUNTY OF MAUI 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAII 96793 TELEPHONE: (808) 270-7511 FAX: (808) 270-7505

November 16, 2020

Munekiyo HIraga Attention: Charlene Shibuya 305 High Street, Suite 104 Wailuku, HI 96793

Early Consultation Request for the Proposed Kuikahi Residential Project; TMK No. (2)3-5-SUBJECT:

002:003(por.); Wailuku, Maui, Hawai'i

Dear Ms. Shibuya,

We appreciate the opportunity to provide early consultation comments on the Proposed Kuikahi Residential project.

The County Department of Transportation provides public transit services within the vicinity of the proposed residential project. In order for public transit to be considered for expansion in new developments, there are certain criteria that makes transit works such as through streets whether it's major collector roads or within the subdivisions. Providing interconnecting sidewalks within and between the subdivisions and ample lighting in the evenings is also necessary for walkable communities and for the safety of potential residents and public transit riders.

Please feel free to contact me if you have any questions.

Sincerely,

Marc Takamori, Director Department of Transportation



Mark Alexander Roy VICE PRESIDENT

Tessa Munekiyo Ng

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Marc Takamori, Director County of Maui Department of Transportation 110 Ala'ihi Street, Suite 210 Kahului, Hawai'i 96732

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Mr. Takamori:

Thank you for your early consultation response letter dated November 16, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we offer the following information in response to the comments noted in your letter:

We acknowledge the Department's comments regarding criteria for implementation of public transit to the project site. The proposed residential neighborhood will contain internal roadways, street lighting, and internal sidewalks which will ultimately connect to an overall sidewalk network between other residential subdivisions in the vicinity of the project area.

Lastly, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Marc Takamori, Director September 7, 2021 Page 2

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Stacy Otomo, Otomo Engineering, Inc.

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Maui Economic Opportunity, Inc.



P.O. Box 2122 Kahului, HI 96733 808-249-2990 Fax: 808-249-2991 www.meoinc.org

November 30, 2020

Muneyiko Hiraga Attn: Charlene Shibuya 305 High Street, Suite 104 Wailuku, HI 96793

Re: Early Consultation Request for the Proposed Kuikahi Residential Project

Dear Charlene Shibuya,

We do not have any objection or comment to the proposed Kuikahi Residential Project; TMK No. (2)3-5-002:003(por.); in Wailuku, Maui, Hawai'i.

Thank you for seeking community comments.

Mahalo nui loa,

Debbie Cabebe, SPHR Chief Executive Officer





Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Debbie Cabebe, SPHR, Chief Executive Officer Maui Economic Opportunity, Inc. P.O. Box 2122 Kahului, Hawai'i 96733

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. Cabebe:

Thank you for your early consultation response letter dated November 30, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we acknowledge that the MEO has no objection or comment on the proposed project at this time.

We would also like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC

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From: Yonamine, Connie E <Connie.Yonamine@charter.com>

Sent: Monday, November 16, 2020 2:16 PM

To: Charlene Shibuya

Subject: Proposed Kuikahi Residential development

Hello Charlene,

We received the early consultation request for this proposed development. At this time we have no questions. Not sure when this will start so when possible, could you email the DWG file for the electrical plans so we can look over.

Let me know if you have any questions.

Thank you,

Connie E. Yonamine | Construction Coordinator II (O) 808.442.4831 | (M) 808.357.0068 (E) Connie.yonamine@charter.com 158 Ma'a Street Kahului HI 96732



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Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy
VICE PRESIDENT

Tessa Munekiyo Ng VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

September 7, 2021

Connie E. Yonamine, Construction Coordinator II Charter Spectrum 158 Ma'a Street Kahului, Hawai'i 96732

SUBJECT: Proposed Kuikahi Residential Project at TMK (2)3-5-002:003 (por.),

Wailuku, Maui, Hawai'i

Dear Ms. Yonamine:

Thank you for your early consultation response email from November 16, 2020 on the subject project. On behalf of Kuikahi Properties, LLC ("Applicant"), we acknowledge that Spectrum does not have any questions on the proposed project at this time. Additionally, as requested, electrical plans for the project will be provided to Spectrum for review upon their availability.

Lastly, we would like to correct a mistake that was included in our initial letter requesting early consultation comments. Our letter stated that the project site is designated as "Urban" by the State Land Use Commission (SLUC). However, the project site is designated as "Agricultural" by the SLUC and, as such, the Applicant will also be pursuing a District Boundary Amendment (DBA) approval. The Maui County Council will be the approving body for the DBA as the project area is under 15 acres in size.

We appreciate your input and will include a copy of your comment letter and this response letter in the Draft Environmental Assessment for the project. Should you have any questions or require additional information, please feel free to contact me at 244-2015.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Stacy Otomo, Otomo Engineering, Inc.

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LETTERS RECEIVED
DURING THE DRAFT
ENVIRONMENTAL
ASSESSMENT REVIEW
PERIOD AND RESPONSES
TO SUBSTANTIVE
COMMENTS



XI. LETTERS RECEIVED DURING THE DRAFT ENVIRONMENTAL ASSESSMENT REVIEW PERIOD AND RESPONSES TO SUBSTANTIVE COMMENTS

The Draft Environmental Assessment (EA) for the subject action was filed and published with the Office of Planning and Sustainable Development on October 8, 2021. The following agencies were sent a copy of the Draft EA. Comments on the Draft EA were received during the 30-day public comment period. Letters received as well as responses to substantive comments are included in this Chapter.

Federal Agencies

- Kahana Stone, Soil Conservationist Natural Resources Conservation Service U.S. Department of Agriculture 77 Hoʻokele Street, Suite 202 Kahului, Hawaiʻi 96732
- Larry Yamamoto, State Conservationist Natural Resources Conservation Svc. U.S. Department of Agriculture P.O. Box 50004 Honolulu, Hawaii 96850-0001
- 3. Linda Speerstra, Chief
 U.S. Department of the Army
 U.S. Army Engineer District, Honolulu
 Regulatory Branch, Building 230
 Fort Shafter, Hawai'i 96858-5440
 (CEPOH-RO@usace.armv.mil)
- Ryan Okahara, Field Office Director
 U.S. Department of Housing and Urban
 Development
 1132 Bishop Street, Suite 1400
 Honolulu, Hawai'i 96813-4918
- Chelsie Javar-Salas, Acting Island Team Leader
 U.S. Fish and Wildlife Service
 300 Ala Moana Blvd., Rm. 3-122
 Honolulu, Hawaii 96850

State Agencies

 Curt T. Otaguro, Comptroller State of Hawai'i
 Dept. of Accounting and General Svcs. 1151 Punchbowl Street, #426 Honolulu, Hawai'i 96813

- Denise Albano, Chair
 State of Hawai'i
 Department of Agriculture
 1428 South King Street
 Honolulu, Hawai'i 96814-2512
- M. Kaleo Manuel, Deputy Director State of Hawai'i Commission on Water Resource Management P.O. Box 621 Honolulu, Hawai'i 96809
- 9. Keith T. Hayashi, Interim State of Hawai'i Department of Education P.O. Box 2360 Honolulu, Hawai'i 96804
- State of Hawai'iDepartment of Health1250 Punchbowl St., Room 325Honolulu, Hawai'i 96813
- 11. Alec Wong, P.E., Chief
 State of Hawai'i
 Dept. of Health, Clean Water Branch
 827 Waimano Home Road
 Hale Ola, Room 225
 Pearl City, Hawai'i 96782
- 12. Patti Kitkowski, District Environmental Health Program Chief State of Hawai'i Department of Health, Maui Sanitation Branch 54 South High Street, Room 300 Wailuku, Hawai'i 96793

- 13. Kathleen Ho, Director
 State of Hawai'i
 Department of Health, Office of
 Environmental Quality Control
 235 S. Beretania Street, Suite 702
 Honolulu, Hawai'i 96813
- 14. Suzanne Case, Chairperson State of Hawai'i Dept. of Land and Natural Resources P.O. Box 621 Honolulu, Hawai'i 96809
- 15. State of Hawai'i
 Department of Public Safety
 919 Ala Moana Blvd., 4th Floor
 Honolulu, Hawai'i 96814
- Jade Butay, Director
 State of Hawai'i
 Department of Transportation
 869 Punchbowl Street
 Honolulu, Hawai'i 96813
- Denise Iseri-Matsubara, Executive Director State of Hawai'i Hawai'i Housing Finance and Development Corporation 677 Queen St., #300 Honolulu, Hawai'i 96813
- 18. Kenneth Hara, Adjutant General Hawai'i State Civil Defense 3949 Diamond Head Road Honolulu, Hawai'i 96816
- 19. William Aila, Jr., Chair
 State of Hawai'i
 Department of Hawaiian Home Lands
 P.O. Box 1879
 Honolulu, Hawai'i 96805
- Sylvia Hussey, Chief Executive Officer State of Hawai'i
 Office of Hawaiian Affairs
 560 N. Nimitz Highway, Suite 200 Honolulu, Hawai'i 96817
- 21. Mary Alice Evans, Director State of Hawai'i Office of Planning P.O. Box 2359 Honolulu, Hawai'i 96804

- 22. Dan Orodenker, Executive Director State of Hawai'i State Land Use Commission P.O. Box 2359 Honolulu, Hawai'i 96804
- 23. University of Hawai'i Institute for Astronomy 2680 Woodlawn Drive Honolulu, Hawai'i 96822

County of Maui Agencies

- 24. Herman Andaya, Administrator
 County of Maui
 Emergency Management Agency
 200 South High Street, 1st Floor
 Wailuku, HI 96793
- 25. Eric Nakagawa, Director County of Maui Department of Environmental Management 2145 Kaohu Street, Suite 102 Wailuku, HI 96793
- 26. Marci Martin, Administrator County of Maui Dept. of Finance-Real Property Division 110 'Ala'ihi Street, Suite 110 Kahului, HI 96732
- 27. Bradford Ventura, Chief
 County of Maui
 Department of Fire and Public Safety
 200 Dairy Road
 Kahului, HI 96732
- Lori Tsuhako, Director
 County of Maui
 Dept. of Housing and Human Concerns
 2200 Main Street, Suite 546
 Wailuku, HI 96793
- 29. Karla Peters, Director
 County of Maui
 Department of Parks & Recreation
 700 Halia Nakoa Street, Unit 2F
 Wailuku, HI 96793
- Michele Chouteau McLean, Director County of Maui Department of Planning 2200 Main Street, Suite 315 Wailuku, HI 96793

- 31. John Rapacz, Administrator County of Maui Department of Planning - ZAED 2200 Main Street, Suite 335 Wailuku, HI 96793
- 32. Dean Rickard, Acting Chief County of Maui Maui Police Department 55 Mahalani Street Wailuku, HI 96793
- 33. Rowena Dagdag-Andaya, Director County of Maui
 Department of Public Works
 200 South High Street, 4th Floor
 Wailuku, HI 96793
- 34. Marc Takamori, Director
 County of Maui
 Department of Transportation
 110 'Ala'ihi Street, Suite 210
 Kahului, HI 96732
- Jeffrey Pearson, Director
 County of Maui
 Department of Water Supply
 200 South High Street, 5th Floor
 Wailuku, HI 96793
- Alice Lee, Council Chair
 Maui County Council
 200 South High Street, 7th Floor
 Wailuku, Hawaii 96793

County of Maui Organizations

- 37. Hawaiian Telcom60 South Church StreetWailuku, Hawai'i 96793
- 38. Tiana Raymonds, Kehalani Community Organization c/o Scott Matsuura, President P.O. Box 1530 Wailuku, Hawai'i 96793
- Debbie Cabebe, Chief Executive Officer Maui Economic Opportunity
 Mahalani Street
 Wailuku, Hawai'i 96793

- 40. Michael Grider, Manager, Engineering Hawaiian Electric Company, Ltd. P.O. Box 398
 Kahului, Hawai'i 96732
- 41. Spectrum 158 Ma'a Street Kahului, Hawai'i 96732
- 42. Travis Polido, President
 Waikapu Community Association
 P.O. Box 3046
 Wailuku, Hawai'i 96793
- 43. Waikapu Gardens Homeowner's Association
 P.O. Box 2390
 Wailuku, Hawai'i 96793
- Kristen Holmes,
 Wailuku Community Association
 c/o Swan Interiors
 2103 W. Vineyard Street
 Wailuku, Hawaii 96793
- 45. Joseph G. Blackburn, II,
 Waiolani Mauka Community Association
 P.O. Box 1067
 Wailuku, Hawai'i 96793
- 46. Wailuku Heights Extension Unit I Community Assoc P.O. Box 698 Wailuku, Hawai'i 96793
- 47. Lester Yano
 Wailuku Heights Extension Unit II
 Community Association
 c/o Hawaiiana Management Co.
 140 Hoʻohana Street, Suite 208
 Kahului, Hawaiʻi 96732
- 48. Hawaiiana Management Company Wailuku Heights Extension Unit II Community Association 1305 N. Holopono Street, Unit 3A Kihei, Hawai'i 96753
- 49. Wayne Hedani, Agent
 Wailuku Heights Extension Community
 Association
 586 Ku'ikahi Drive
 Wailuku, Hawai'i 96793

- 50. Joseph G. Blackburn, II, Waiolani Community Association P.O. Box 1067 Wailuku, Hawai'i 96793
- 51. Joseph G. Blackburn, II, Waiolani Elua Community Association P.O. Box 1067 Wailuku, Hawaiʻi 96793



United States Department of the Interior



FISH AND WILDLIFE SERVICE Pacific Islands Fish and Wildlife Office 300 Ala Moana Boulevard, Room 3-122 Honolulu, Hawai'i 96850

In Reply Refer To: 01EPIF00-2022-TA-0020

October 22, 2021

Buddy Almeida County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawai'i 96793

Subject: Comments on the Draft Environmental Assessment for the Proposed Kuikahi

Affordable Housing Project, Wailuku, Maui

Dear Buddy Almeida:

The U.S. Fish and Wildlife Service (Service) received your request for comment on the Draft Environmental Assessment (Draft EA) for the Kuikahi Affordable Housing Project in Wailuku, Maui, Hawai'i on October 6, 2021. This project proposes to construct a new residential community to include a variety of residence types such as multi-family, duplex, live-work, studio, and single-family units on an approximately 14.9-acre portion of Tax Map Key (2)3-5-002:003.

This letter has been prepared under the authority of, and in accordance with, provisions of the Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 *et seq.*), as amended. We provide the following comments for incorporation in your final Environmental Assessment and further consultation as necessary.

Thank you for committing to incorporate appropriate Best Management Practices (BMPs) to minimize impacts to aquatic resources (page 20). We have enclosed our recommended BMPs for aquatic resources for your consideration and incorporation into your project plans as applicable.

Please provide additional detail in the final EA regarding listed species that may occur or transit through the proposed project area. Below, we provide a list of species and our recommended avoidance and minimization measures for your consideration and incorporation into the final EA and your project plans as applicable.

INTERIOR REGION 9
COLUMBIA-PACIFIC NORTHWEST

INTERIOR REGION 12 PACIFIC ISLANDS

American Sāmoa, Guam, Hawaiʻi, Northern Mariana Islands

Our data indicate the following federally listed species may occur or transit through the vicinity of the proposed project area: the threatened Hawaiian goose or nēnē (*Branta sandvicensis*), the endangered 'ōpe'ape'a or Hawaiian hoary bat (*Lasiurus cinereus semotus*), the endangered 'ua'u or Hawaiian petrel (*Pterodroma sandwicensis*), the endangered 'ake'ake or Hawai'i distinct population segment of the band-rumped storm-petrel (*Oceanodroma castro*), the threatened 'a'o or Newell's shearwater (*Puffinus auricularis newelli*), the endangered ae'o or Hawaiian stilt (*Himantopus mexicanus knudseni*), the endangered 'alae ke'oke'o or Hawaiian coot (*Fulica alai*), and the endangered Blackburn's sphinx moth (*Manduca blackburni*). The Hawaiian petrel, band-rumped storm-petrel, and Newell's shearwater will hereafter, collectively be referred to as "Hawaiian seabirds." There is no critical habitat for listed species within 0.75 miles (1.2 kilometers) of this proposed project.

Hawaiian goose

The Hawaiian goose is found on the islands of Hawai'i, Maui, Moloka'i, and Kaua'i. They may be observed in a variety of habitats, but prefer open areas, such as pastures, golf courses, wetlands, natural grasslands and shrublands, and lava flows. Threats to the species include introduced mammalian and avian predators, wind energy facilities, and vehicle strikes.

To avoid and minimize potential project impacts to the Hawaiian goose we recommend you incorporate the following applicable measures into your project plan:

- Do not approach, feed, or disturb the Hawaiian goose.
- If Hawaiian geese are observed loafing or foraging within the project area during the breeding season (September through April), have a biologist familiar with Hawaiian goose nesting behavior survey for nests in and around the project area prior to the resumption of any work. Repeat surveys after any subsequent delay of work of 3 or more days (during which the birds may attempt to nest).
- Cease all work immediately and contact the Service for further guidance if a nest is discovered within a radius of 150 ft of proposed project, or a previously undiscovered nest is found within the 150 ft radius after work begins.
- In areas where Hawaiian geese are known to be present, post and implement reduced speed limits, and inform project personnel and contractors about the presence of endangered species on-site.

Hawaiian hoary bat

The Hawaiian hoary bat roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs when they forage. If trees or shrubs 15 ft or taller are cleared during the pupping season, there is a risk that young bats could inadvertently be harmed or killed since they are too young to fly or may not move away. Additionally, Hawaiian hoary bats forage for insects from as low as 3 ft to higher than 500 ft above the ground and can become entangled in barbed wire used for fencing.

To avoid and minimize impacts to the endangered Hawaiian hoary bat we recommend you incorporate the following applicable measures into your project plan:

- Do not disturb, remove, or trim woody plants greater than 15 ft tall during the batbirthing and pup-rearing season (June 1 through September 15).
- Do not use barbed wire for fencing.

Hawaiian seabirds

Hawaiian seabirds may traverse the project area at night during the breeding, nesting, and fledging seasons (March 1 to December 15). Outdoor lighting could result in seabird disorientation, fallout, and injury or mortality. Seabirds are attracted to lights and after circling the lights they may become exhausted and collide with nearby wires, buildings, or other structures or they may land on the ground. Downed seabirds are subject to increased mortality due to collision with automobiles, starvation, and predation by dogs, cats, and other predators. Young birds (fledglings) traversing the project area between September 15 and December 15, in their first flights from their mountain nests to the sea, are particularly vulnerable to light attraction. Thank you for acknowledging the need to shield lighting to protect Hawaiian seabirds (page 23).

To avoid and minimize potential project impacts to seabirds we recommend you incorporate the following measures applicable into your project plan:

- Fully shield all outdoor lights so the bulb can only be seen from below.
- Install automatic motion sensor switches and controls on all outdoor lights or turn off lights when human activity is not occurring in the lighted area.
- Avoid nighttime construction during the seabird fledging period, September 15 through December 15.

Hawaiian waterbirds

Hawaiian waterbirds are currently found in a variety of wetland habitats including freshwater marshes and ponds, coastal estuaries and ponds, artificial reservoirs, *Colocasia esculenta* (kalo or taro) lo'i or patches, irrigation ditches, sewage treatment ponds. Hawaiian stilts may also be found wherever ephemeral or persistent standing water may occur. Threats to these species include nonnative predators, habitat loss, and habitat degradation.

Based on the project details provided, your project may result in the creation of standing water or open water that could attract Hawaiian waterbirds to the project site. In particular, the Hawaiian stilt is known to nest in sub-optimal locations (e.g., any ponding water), if water is present. Hawaiian waterbirds attracted to sub-optimal habitat may suffer adverse impacts, such as predation and reduced reproductive success, and thus the project may create an attractive nuisance. Therefore, we recommend you work with our office during project planning so that we may assist you in developing measures to avoid impacts to listed species (e.g., fencing, vegetation control, predator management).

To avoid and minimize potential project impacts to Hawaiian waterbirds we recommend you incorporate the following applicable measures into your project plan:

- In areas where waterbirds are known to be present, post and implement reduced speed limits, and inform project personnel and contractors about the presence of endangered species on-site.
- If water resources are located within or adjacent to the project site, incorporate applicable best management practices regarding work in aquatic environments into the project design (see enclosed Aquatic Best Management Practices).

• Have a biological monitor that is familiar with the species' biology conduct Hawaiian waterbird nest surveys where appropriate habitat occurs within the vicinity of the proposed project site prior to project initiation. Repeat surveys again within 3 days of project initiation and after any subsequent delay of work of 3 or more days (during which the birds may attempt to nest). If a nest or active brood is found:

- o Contact the Service within 48 hours for further guidance.
- Establish and maintain a 100-ft buffer around all active nests and/or broods until the chicks have fledged. Do not conduct potentially disruptive activities or habitat alteration within this buffer.
- Have a biological monitor that is familiar with the species' biology present on the project site during all construction or earth moving activities until the chicks fledge to ensure that Hawaiian waterbirds and nests are not adversely impacted.

Blackburn's sphinx moth

The adult Blackburn's sphinx moth feeds on nectar from native plants, including *Ipomoea pescaprae* (beach morning glory), *Plumbago zeylanica* ('ilie'e), *Capparis sandwichiana* (maiapilo), and others. Blackburn's sphinx moth larvae feed on nonnative *Nicotiana glauca* (tree tobacco), and native, federally listed, *Nothocestrum* spp. ('aiea). To pupate, the larvae burrow into the soil and can remain in a state of torpor for a year or more before emerging from the soil. Soil disturbance can result in death of the pupae.

We offer the following survey recommendations to assess whether the Blackburn's sphinx moth occurs within the project area:

- A biologist familiar with the species should survey areas of proposed activities for Blackburn's sphinx moth and its larval host plants prior to work initiation.
 - Surveys should be conducted during the wettest portion of the year (usually November to April or several weeks after a significant rain) and within 4 to 6 weeks prior to construction.
 - O Surveys should include searches for adults, eggs, larvae, and signs of larval feeding (i.e., chewed stems, frass, or leaf damage).
 - o If moths, eggs, larvae, or native 'aiea or tree tobacco over 3 ft tall, are found during the survey, please contact the Service for additional guidance to avoid impacts to this species.

If no Blackburn's sphinx moth, 'aiea, or tree tobacco are found during surveys, it is imperative that measures be taken to avoid attraction of Blackburn's sphinx moth to the project location and prohibit tree tobacco from entering the site. Tree tobacco can grow greater than 3 ft tall in approximately 6 weeks. If it grows over 3 ft tall, the plants may become a host plant for Blackburn's sphinx moth. We therefore recommend that you:

- Remove any tree tobacco less than 3 ft tall.
- Monitor the site every 4 to 6 weeks for new tree tobacco growth before, during, and after the proposed ground-disturbing activity.
 - Monitoring for tree tobacco can be completed by any staff, such as groundskeeper or regular maintenance crew, provided with picture placards of tree tobacco at different life stages.

Measures to Avoid the Spread of Invasive Species

Construction activities at project areas in or near local natural areas and areas with native habitat, risk introduction of nonnative species. Ensure that all equipment, personnel, and supplies are properly checked and are free of contamination (i.e., weed seeds, organic matter, or other contaminants) before entering natural areas and areas with native habitat.

The Service recommends incorporating all applicable avoidance and minimization measures into your project design to avoid and minimize effects on protected species. If you determine the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. We appreciate your efforts to conserve protected species. If you have questions regarding this letter, please contact Melissa Cady, Fish and Wildlife Biologist at 808-933-6963 or melissa_cady@fws.gov. When referring to this project, please include this reference number: 01EPIF00-2022-TA-0020.

Sincerely,

CHELSIE Digitally signed by CHELSIE JAVAR-SALAS

SALAS
Date: 2021.10.22
08:30:39 -10'00'

Acting Island Team Manager Pacific Islands Fish and Wildlife Office

Enclosure (1): Recommended Standard Aquatic Best Management Practices

cc: Charlene Shibuya, Senior Associate Munekiyo Hiraga

U.S. Fish and Wildlife Service Recommended Standard Best Management Practices

The U.S. Fish and Wildlife Service (USFWS) recommends the following measures to be incorporated into project planning to avoid or minimize impacts to fish and wildlife resources. Best Management Practices (BMPs) include the incorporation of procedures or materials that may be used to reduce either direct or indirect negative impacts to aquatic habitats that result from project construction-related activities. These BMPs are recommended in addition to, and do not over-ride any terms, conditions, or other recommendations prepared by the USFWS, other federal, state or local agencies. If you have questions concerning these BMPs, please contact the USFWS Aquatic Ecosystems Conservation Program at 808-792-9400.

- 1. Authorized dredging and filling-related activities that may result in the temporary or permanent loss of aquatic habitats should be designed to avoid indirect, negative impacts to aquatic habitats beyond the planned project area.
- 2. Dredging/filling in the marine environment should be scheduled to avoid coral spawning and recruitment periods, and sea turtle nesting and hatching periods. Because these periods are variable throughout the Pacific islands, we recommend contacting the relevant local, state, or federal fish and wildlife resource agency for site specific guidance.
- 3. Turbidity and siltation from project-related work should be minimized and contained within the project area by silt containment devices and curtailing work during flooding or adverse tidal and weather conditions. BMPs should be maintained for the life of the construction period until turbidity and siltation within the project area is stabilized. All project construction-related debris and sediment containment devices should be removed and disposed of at an approved site.
- 4. All project construction-related materials and equipment (dredges, vessels, backhoes, silt curtains, etc.) to be placed in an aquatic environment should be inspected for pollutants including, but not limited to; marine fouling organisms, grease, oil, etc., and cleaned to remove pollutants prior to use. Project related activities should not result in any debris disposal, non-native species introductions, or attraction of non-native pests to the affected or adjacent aquatic or terrestrial habitats. Implementing both a litter-control plan and a Hazard Analysis and Critical Control Point plan (HACCP see https://www.fws.gov/policy/A1750fw1.html) can help to prevent attraction and introduction of non-native species.
- 5. Project construction-related materials (fill, revetment rock, pipe, etc.) should not be stockpiled in, or in close proximity to aquatic habitats and should be protected from erosion (*e.g.*, with filter fabric, etc.), to prevent materials from being carried into waters by wind, rain, or high surf.
- 6. Fueling of project-related vehicles and equipment should take place away from the aquatic environment and a contingency plan to control petroleum products accidentally spilled during the project should be developed. The plan should be retained on site with the person responsible for compliance with the plan. Absorbent pads and containment booms should be stored on-site to facilitate the clean-up of accidental petroleum releases.
- 7. All deliberately exposed soil or under-layer materials used in the project near water should be protected from erosion and stabilized as soon as possible with geotextile, filter fabric or native or non-invasive vegetation matting, hydro-seeding, etc.



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Chelsie Javar-Salas, Acting Island Team Manager U.S. Fish and Wildlife Service Pacific Islands Fish and Wildlife Office 300 Ala Moana Boulevard, Room 3-122 Honolulu, Hawai'i 96850

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-002:003 (por.), Wailuku, Maui, Hawaiʻi, (01 EPI.F002002-TA-0020)

Dear Ms. Javar-Salas:

Thank you for your letter dated October 22, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

1. <u>Comment:</u> Thank you for committing to incorporate appropriate Best Management Practices (BMPs) to minimize impacts to aquatic resources (page 20). We have enclosed our recommended BMPs for aquatic resources for your consideration and incorporation into your project plans as applicable.

Response: We appreciate the USFWS's recommended BMPs for aquatic resources, and will incorporate the measures into the project to the extent practicable.

2. <u>Comment:</u> Please provide additional detail in the final EA regarding listed species that may occur or transit through the proposed project area. Below, we provide a list of species and our recommended avoidance and minimization measures for your consideration and incorporation into the final EA and your project plans as applicable.

Our data indicate the following federally listed species may occur or transit through the vicinity of the proposed project area: the threatened Hawaiian goose or nēnē (Branta sandvicensis), the endangered 'ōpe'ape'a or

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Hawaiian hoary bat (Lasiurus cinereus semotus), the endangered 'ua'u or Hawaiian petrel (Pterodroma sandwicensis), the endangered 'ake'ake or Hawai'i distinct population segment of the band-rumped storm-petrel (Oceanodroma castro), the threatened 'a'o or Newell's shearwater (Puffinus auricularis newelli), the endangered ae'o or Hawaiian stilt (Himantopus mexicanus knudseni), the endangered 'alae ke'oke'o or Hawaiian coot (Fulica alai), and the endangered Blackburn's sphinx moth (Manduca blackburni). The Hawaiian petrel, band-rumped storm-petrel, and Newell's shearwater will hereafter, collectively be referred to as "Hawaiian seabirds." There is no critical habitat for listed species within 0.75 miles (1.2 kilometers) of this proposed project.

Response: A Flora and Fauna Survey was prepared for the proposed project and included in the Draft EA. There were no endangered Hawaiian hoary bats recorded during the survey. However, it was noted that if they were found in the project area, that the USFWS has guidelines for their protection, which the Applicant will abide by. Further, timing of project site clearing will avoid the bat birthing and pup rearing season (June 1 to September 15) and the Applicant agrees to avoid the use of barbed wire during new construction.

> It is noted that the project's Flora and Fauna Survey did not find any Blackburn's Sphinx moth (BSM) at the project site and also did not identify any of the host plants for the moth. In order to avoid any adverse impacts to the BSM and its habitat, the Applicant will coordinate with the USFWS to determine if the BSM is present and whether a vegetation survey should be conducted.

> The Flora and Fauna survey reported that no native bird species (including the Nene) were found at the project area during the two (2) site visits to complete the survey. Nevertheless, if any Nene are present during construction activities, all activities within 100 feet will stop until the birds have left the area on their own accord. As noted in the Draft EA, the Applicant will shield all significant outdoor lighting downward to minimize disorientation of any native seabirds flying overhead.

Comment: Measures to Avoid the Spread of Invasive Species 3. Construction activities at project areas in or near local natural areas and areas with native habitat, risk introduction of nonnative species. Ensure that all equipment, personnel, and supplies are properly checked and are free of contamination (i.e., weed seeds, organic matter, or other contaminants) before entering natural areas and areas with native habitat.

Chelsie Javar-Salas, Acting Island Team Manager May 16, 2022 Page 3

Response: The Applicant confirms that all construction equipment, personnel, and supplies will be properly cleaned and checked so that they are

free of contamination before entering areas with native habitat.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

Robert Hobdy, Biologist

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DAVID Y. IGE GOVERNOR



CURT T. OTAGURO COMPTROLLER

AUDREY HIDANO DEPUTY COMPTROLLER

STATE OF HAWAII DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES

(P)21.169

P O BOX 119 HONOLULU HAWAII 96810-0119

OCT 1 4 2021

Buddy Almeida, Housing Administrator County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Dear Mr. Almeida:

Subject:

Draft Environmental Assessment for the Kuikahi Affordable Housing

Project at TMK: (2) 3-5-002: 003 (por)

Thank you for the opportunity to comment on the subject project. We have no comments to offer at this time as the proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities.

If you have any questions, your staff may call Ms. Gayle Takasaki of the Planning Branch at (808) 586-0584.

Sincerely,

CHRISTINE L. KINIMAKA
Public Works Administrator

GT:mo

c:

Charlene Shibuya, Munekiyo Hiraga

DAGS MDO



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Gayle Takasaki State of Hawai'i Department of Accounting and General Services Planning Branch P.O. Box 119 Honolulu, Hawai'i 96810-0119

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Ms. Takasaki:

Thank you for your letter dated October 14, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge that the Department has no comments on the proposed project.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

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DAVID Y. IGE



SUZANNE D. CASE

MICHAEL G. BUCK ELIZABETH A. CHAR, M.D. NEIL J. HANNAHS AURORA KAGAWA-VIVIANI, PH.D. WAYNE K. KATAYAMA PAUL J. MEYER

M. KALEO MANUEL

REF: RFD.5506.6

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES COMMISSION ON WATER RESOURCE MANAGEMENT

P.O. BOX 621 HONOLULU, HAWAII 96809

November 3, 2021

Ms. Charlene Shibuya, Senior Associate

TO: Ms. Charlene Shil Munekiyo Hiraga

FROM: M. Kaleo Manuel, Deputy Director

Commission on Water Resource Management

SUBJECT: Draft Environmental Assessment for the Kuikahi Affordable Housing Project

FILE NO.: RFD.5506.6 TMK NO.: (2) 3-5-002:003

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at http://dlnr.hawaii.gov/cwrm.

Our comments related to water resources are checked off below.

X	1.	We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
39	2.	We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
	3.	We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
X	4.	We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed. A listing of fixtures certified by the EAP as having high water efficiency can be found at http://www.epa.gov/watersense.
X	5.	We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://planning.hawaii.gov/czm/initiatives/low-impact-development/
X	6.	We recommend the use of alternative water sources, wherever practicable.
X	7.	We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at http://energy.hawaii.gov/green-business-program.
X	8.	We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp.content/uploads/2013/04/LICH_trigation_Conservation_RMPs.pdf

Page 2 November 3, 2021 There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments. A Well Construction Permit(s) is (are) are required before the commencement of any well construction 12 A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project. 13 There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow 14 standard amendment. 15 A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a steam channel. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or 16 17 A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources. Planning - Please coordinate with the respective Planning Department and/or Department of Water X OTHER: Supply to incorporate this project into the county water use and development plan. The final EIS should acknowledge that the water provider conducts annual water audits to assess their system's water losses. The Hawaii Water Plan is directed toward the achievement of the utilization of reclaimed water for

Ms. Charlene Shibuya

The Hawaii Water Plan is directed toward the achievement of the utilization of reclaimed water for uses other than drinking and for potable water needs in one hundred per cent of State and County facilities by December 31, 2045 (§174C-31(g)(6), Hawai'i Revised Statutes). We strongly recommend that this project consider using reclaimed water for its non-potable water needs, such as irrigation. Reclaimed water may include, but is not limited to, recycled wastewater, gray water, and captured rainwater/stormwater. Please contact the Hawai'i Department of Health, Wastewater Branch, for more information on their reuse guidelines and the availability of reclaimed water in the project area.

If you have any questions, please contact Neal Fujii of the Commission staff at 587-0216.



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

M. Kaleo Manuel, Deputy Director State of Hawai'i Commission on Water Resource Management P.O. Box 621 Honolulu, Hawai'i 96809

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'l (REF: RFD.5506.6)

Dear Mr. Manuel:

Thank you for your letter dated November 3, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

- 1. Thank you for your recommendation. The project team will coordinate with the Planning Department and/or Department of Water Supply (DWS) to incorporate the proposed Kuikahi Village Project into the County's Water Use and Development Plan.
- 4. As recommended, the proposed project will install water efficient fixtures and implement water efficient practices throughout the development so as to reduce fresh water demand.
- 5. Best Management Practices (BMP) for stormwater management will be implemented throughout the project to mitigate impacts from storm/flood events. As recommended in the Preliminary Engineering and Drainage Report, the use of retention areas is proposed for the project, so as to address potential flooding at the project area.
- 6. Thank you for your comment. The project team will continue to coordinate with the DWS on potential alternative water sources to address water demands at the project site.
- 7. We appreciate your recommendation. The project will review and consider participating in the Hawai'i Green Business Program.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

M. Kaleo Manuel, Deputy Director May 16, 2022 Page 2

8. We appreciate your recommendation. The project team will review and consider adopting landscape irrigation conservation BMPs endorsed by the Landscape Industry Council of Hawai'i.

OTHER. As noted, the Applicant will continue its coordination with the Planning Department and/or DWS to incorporate this project into the County water use and development plan.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders Stacy Otomo, Otomo Engineering, Inc. Bill Mitchell, Hawaii Land Design

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STATE OF HAWAI'I

DEPARTMENT OF EDUCATION

P.O. BOX 2360 HONOLULU, HAWAI'I 96804

OFFICE OF FACILITIES AND OPERATIONS

November 1, 2021

Buddy Almeida Housing Administrator, County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Re: Draft Environmental Assessment for the Kuikahi Affordable Housing Project, Wailuku, Maui, Hawaii, TMK (2) 3-5-002:003 (Por.)

Dear Mr. Almeida:

Thank you for your letter dated October 5, 2021.

The Hawaii State Department of Education previously provided comments on the Project by letter dated November 27, 2020, and has no additional comments.

Thank you for the opportunity to comment. Should you have questions, please contact Robyn Loudermilk, School Lands and Facilities Specialist with the Facilities Development Branch, Planning Section, at (808) 784-5093 or via email at robyn.loudermilk@k12.hi.us.

Sincerely,

Roy\keda Interim Public Works Manager Planning Section

RI:ctc

 Kathleen Dimino, Complex Area Superintendent, Baldwin-Kekaulike-Maui Complexes Charlene Shibuya, Munekiyo Hiraga Facilities Development Branch



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Roy Ikeda, Interim Public Works Manager State of Hawai'i Planning Section Department of Education P.O. Box 2360 Honolulu, Hawai'i 96804

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Mr. Ikeda:

Thank you for your letter dated November 1, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge that the Department has no additional comments on the proposed project. The Applicant received the Department's comments during the early consultation process, which were included in the Draft EA.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli. Alaula Builders

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Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

DAVID Y. IGE



STATE OF HAWAII DEPARTMENT OF HEALTH Maui District Health Office 54 South High St. Rm. #301 Wailuku, HI 96793

October 18, 2021

ELIZABETH A. CHAR, M.D.

Lorrin W. Pang, M.D., M.P.H. District Health Officer

Mr. Buddy Almeida Housing Administrator County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Dear Mr. Almeida:

Subject:

Draft Environmental Assessment for the Kuikahi Affordable Housing

Project, Wailuku, Maui, Hawaii TMK: (2) 3-5-002:003 (por.)

Thank you for the opportunity to review this project. We have the following comments to offer:

The proposed project is on land that was formally used in the production of sugarcane and/or pineapple and should be characterized for soil contamination. Please contact the Department of Health, Hazard Evaluation and Emergency Response Office (HEER) at 808 586-4249.

It is strongly recommended that you review the department's website at https://health.hawaii.gov/epo/landuse/ and contact the appropriate program that concerns your project.

Should you have any questions, please contact me at 808 984-8230 or email me at patricia.kitkowski@doh.hawaii.gov.

Sincerely,

Patti Kitkowski

District Environmental Health Program Chief

c Joanna L. Seto, EMD Chief {Via Email}
Charlene Shibuya, Munekiyo Hiraga



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Patti Kitkowski, District Environmental Health Program Chief State of Hawai'i Department of Health Maui District Health Office 54 South High Street, Room 301 Wailuku, Hawai'i 96793

SUBJECT:

Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-002:003 (por.), Wailuku, Maui, Hawai'i

Dear Ms. Kitkowski:

Thank you for your letter dated October 18, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

1. <u>Comment:</u> The proposed project is on land that was formally used in the production of sugarcane and/or pineapple and should be characterized for soil contamination. Please contact the Department of Health, Hazard Evaluation and Emergency Response Office (HEER) at 808 586-4249.

Response:

Thank you for your comment. The Applicant has contacted the Department of Health, Hazard Evaluation and Emergency Response Office regarding the potential soil contamination of the project site. The Applicant will comply with the recommendations of the HEER office for the project site.

It is noted that previous soil testing of the site was conducted in 2004. While the testing was conducted for a previous project, it is noted that there has been no large scale agricultural operation on the site since the early 2000's. Information on the prior site testing was included in the Draft EA.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli. Alaula Builders

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Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

November 8, 2021

County of Maui Department of Housing and Human Concerns Attn: Mr. Buddy Almeida

2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Dear Mr. Almeida:

SUBJECT: Draft Environmental Assessment for the **Kuikahi Affordable Housing**

Project located at Wailuku, Island of Maui; TMK: (2) 3-5-002:003 (Por.)

via email: buddy.almeida@co.maui.hi.us

on behalf of Kuikahi Properties, LLC

Thank you for the opportunity to review and comment on the subject matter. The Land Division of the Department of Land and Natural Resources (DLNR) distributed or made available a copy of your request pertaining to the subject matter to DLNR's Divisions for their review and comments.

At this time, enclosed are comments from the (a) Engineering Division, (b) Division of Forestry & Wildlife, and (c) Land Division-Maui District on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji Land Administrator

Enclosures

cc: Central Files

Munekiyo Hiraga (w/copies)

Attn: Ms. Charlene Shibuya (via email: planning@munekiyohiraga.com)





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

		Oc	tober 8, 2021				
FROM:	<u>MEMORANDUM</u>						
	TO:	DLNR Agencies:Div. of Aquatic ResourcesDiv. of Boating & Ocean Recreation X Engineering Division (DLNR.ENGR@hawaii.gov) X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)Div. of State Parks X Commission on Water Resource Management (DLNR.CWRM@hawaii.gov)Office of Conservation & Coastal Lands X Land Division – Maui District (daniel.l.ornellas@hawaii.gov)					
TO:	FROM: SUBJECT: LOCATION: APPLICANT:	Russell Y. Tsuji, Land Administrator Russell Tsuji Draft Environmental Assessment for the Kuikahi Affordable Housing Project Wailuku, Island of Maui; TMK: (2) 3-5-002:003 (Por.) Munekiyo Hiraga on behalf of Kuikahi Properties, LLC					
	Transmitted for your review and comment is information on the above-referenced subject matter. The DEA was published on October 8, 2021 by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, The Environmental Notice , available at the following link:						
	http://oeqc2.doh.hawaii.gov/The Environmental Notice/2021-10-08-TEN.pdf						
	Please submit any comments by November 5, 2021 . If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov . Thank you.						
	BRIEF COMMEN	TS:	 () We have no objections. () We have no comments. (✓) We have no additional comments. () Comments are included/attached. Signed:				
			Print Name:	Carty S. Chang, Chief Engineer			
			Division:	Engineering Division			

Date:

Attachments

CC: **Central Files** Oct 29, 2021





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

October 8, 2021

MEMORANDUM

TO:	DLNR Agencies:Div. of Aquatic ResourceDiv. of Boating & Oce	ean Red (<u>DLNR.</u> dlife (<u>ru</u> r Resoun n & Coa	ENGR@ byrosa.t urce Mar astal Lar	<u>.terrago@hawaii.gov</u>) nagement (<u>DLNR.CWRM@hawaii.gov</u>) nds					
FROM: SUBJECT: LOCATION: APPLICANT:	N: Wailuku, Island of Maui; TMK: (2) 3-5-002:003 (Por.)								
Transmitted for your review and comment is information on the above-referenced subject matter. The DEA was published on October 8, 2021 by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, <u>The Environmental Notice</u> , available at the following link:									
http://oeqc2.doh.hawaii.gov/The Environmental Notice/2021-10-08-TEN.pdf									
Please submit any comments by November 5, 2021 . If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov . Thank you.									
BRIEF COMMENT	() () ()	We hav	re no objections. re no comments. re no additional comments. ents are included/attached.						
		Signed:		ner					
	Print Name:		DAVID G. SMITH, Administrator						
		Division:		Division of Forestry and Wildlife					
		Date:		Oct 29, 2021					

Attachments

cc: Central Files





STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES DIVISION OF FORESTRY AND WILDLIFE 1151 PUNCHBOWL STREET, ROOM 325 HONOLULU, HAWAII 96813

October 29, 2021

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA

M. KALEO MANUEL DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEY ANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
LAND

Log no. 3374

MEMORANDUM

TO: RUSSELL Y. TSUJI, Administrator

Land Division

FROM: DAVID G. SMITH, Administrator

Division of Forestry and Wildlife

SUBJECT: Division of Forestry and Wildlife Comments on the Draft Environmental

Assessment (DEA) for the Kuikahi Affordable Housing Project on Maui

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) has received your request consultation on the DEA for the proposed Kuikahi Affordable Housing project in Wailuku on the Island of Maui, Hawai'i; TMK: (2) 3-5-002:003 (Por.). The proposed project will involve the construction of a new residential community that will include 204 residential units in a variety types including multi-family, duplex, live-work, studio, and single family units on approximately 14.9-acres. The proposed project will also include construction of approximately 460 parking stalls, a pavilion, playground, pedestrian and bike paths, and "spot parks" for residents' use. Other related improvements will include internal roadways and sidewalks, landscaping, drainage improvements, and utility connections.

The State listed Hawaiian Hoary Bat or 'Ōpe'ape'a (*Lasiurus cinereus semotus*) could potentially occur in the vicinity of the project area and may roost in trees on-site or nearby. Any site clearing required should be timed to avoid disturbance during the bat birthing and pup rearing season (June 1 through September 15). During this period, woody plants greater than 15 feet (4.6 meters) tall should not be disturbed, removed, or trimmed. DOFAW prefers that new construction avoid the use of barbed wire.

The project site occurs within the historic range of the State listed Blackburn's Sphinx Moth (BSM; *Manduca blackburni*). Larvae of BSM feed on many nonnative hostplants that include tree tobacco (*Nicotiana glauca*) which grows in disturbed soil. We recommend contacting our Maui DOFAW office at (808) 984-8100 for further information about where BSM may be present and whether a vegetation survey should be conducted to determine the presence of plants preferred by BSM. To avoid harm to BSM, DOFAW recommends removing plants less than one meter in height or during the dry time of the year. If you remove tree tobacco over one meter in height or disturb the ground around or within several meters of these plants, they must be checked thoroughly for the presence of eggs and larvae.

State listed Hawaiian Goose or Nēnē (*Branta sandvicensis*) could potentially occur in the vicinity of the proposed project site. It is against State law to harm or harass this species. If any Nēnē are present during construction activities, all activities within 100 feet (30 meters) should cease, and

birds should not be approached. Work may continue after the birds leave the area of its own accord. If a nest is discovered at any point, please contact the Maui DOFAW Office at (808) 984-8100.

Artificial lighting can adversely impact seabirds that may pass through the area at night by causing disorientation. This disorientation can result in collision with manmade structures or grounding of birds. For nighttime lighting that might be required, DOFAW recommends that all lights be fully shielded to minimize impacts. However, nighttime work that requires outdoor lighting should be avoided during the seabird fledging season from September 15 through December 15. This is the period when young seabirds take their maiden voyage to the open sea. For illustrations and guidance related to seabird-friendly light styles that also protect the dark, starry skies of Hawai'i please visit: https://dlnr.hawaii.gov/wildlife/files/2016/03/DOC439.pdf.

DOFAW recommends minimizing the movement of plant or soil material between worksites, such as in fill. Soil and plant material may contain invasive fungal pathogens, vertebrate and invertebrate pests (e.g., Little Fire Ants, Coconut Rhinoceros Beetles), or invasive plant parts that could harm our native species and ecosystems. We recommend consulting the Maui Invasive Species Committee at (808) 573-6472 in planning, design, and construction of the project to learn of any high-risk invasive species in the area and ways to mitigate spread. All equipment, materials, and personnel should be cleaned of excess soil and debris to minimize the risk of spreading invasive species. Gear that may contain soil, such as work boots and vehicles, should be thoroughly cleaned with water and sprayed with 70% alcohol solution to prevent the spread of Rapid 'Ōhi'a Death and other harmful fungal pathogens.

To prevent the spread of Rapid 'Ōhi'a Death (ROD), if 'ōhi'a trees are present and will be removed, trimmed, or potentially injured DOFAW requests that the information and guidance at the following website be reviewed and followed: https://cms.ctahr.hawaii.edu/rod.

DOFAW recommends using native plant species for landscaping that are appropriate for the area (i.e., climate conditions are suitable for the plants to thrive, historically occurred there, etc.). Please do not plant invasive species. DOFAW recommends consulting the Hawai'i-Pacific Weed Risk Assessment website to determine the potential invasiveness of plants proposed for use in the project (https://sites.google.com/site/weedriskassessment/home). We recommend that you refer to www.plantpono.org for guidance on selection and evaluation for landscaping plants.

We appreciate your efforts to work with our office for the conservation of our native species. Should the scope of the project change significantly, or should it become apparent that threatened or endangered species may be impacted, please contact our staff as soon as possible. If you have any questions, please contact Paul Radley, Protected Species Habitat Conservation Planning Coordinator at (808) 295-1123 or paul.m.radley@hawaii.gov.

Sincerely,

NGL

DAVID G. SMITH Administrator





SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES LAND DIVISION

POST OFFICE BOX 621 HONOLULU, HAWAII 96809

October 8, 2021

MEMORANDUM

TO:	DLNR Agencies:Div. of Aquatic ResourcesDiv. of Boating & Ocean Recreation X Engineering Division (DLNR.ENGR@hawaii.gov) X Div. of Forestry & Wildlife (rubyrosa.t.terrago@hawaii.gov)Div. of State Parks X Commission on Water Resource Management (DLNR.CWRM@hawaii.govOffice of Conservation & Coastal Lands X Land Division – Maui District (daniel.l.ornellas@hawaii.gov)							
FROM: Russell Y. Tsuji, Land Administrator **Russell Tsuji* SUBJECT: Draft Environmental Assessment for the **Kuikahi Affordable Housing P** LOCATION: Wailuku, Island of Maui; TMK: (2) 3-5-002:003 (Por.) APPLICANT: Munekiyo Hiraga on behalf of Kuikahi Properties, LLC								
Transmitted for your review and comment is information on the above-referenced subject matter. The DEA was published on October 8, 2021 by the State Environmental Review Program (formerly the Office of Environmental Quality Control) at the Office of Planning and Sustainable Development in the periodic bulletin, <u>The Environmental Notice</u> , available at the following link:								
http://oeqc2.doh.hawaii.gov/The Environmental Notice/2021-10-08-TEN.pdf								
Please submit any comments by November 5, 2021 . If no response is received by this date, we will assume your agency has no comments. Should you have any questions, please contact Darlene Nakamura directly via email at darlene.k.nakamura@hawaii.gov . Thank you.								
BRIEF COMMENT	'S:	We have	ve no objections. ve no comments. ve no additional comments. ents are included/attached. Demiel Ornells. Land Div. MOLO 10/21/21					

Attachments

cc: Central Files



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Russel Y. Tsuji, Land Administrator State of Hawai'i Department of Land and Natural Resources P.O. Box 621 Honolulu, Hawai'i 96809

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Mr. Tsuji:

Thank you for your letter dated November 8, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

ENGINEERING DIVISION

We acknowledge that the Engineering Division of the Department of Land and Natural Resources (DLNR) does not have any additional comments on the proposed project. Comments were received during the early consultation process and were included in the Draft EA.

DIVISION OF FORESTRY AND WILDLIFE (DOFAW)

We appreciate the DOFAW's comments regarding potential species which could occur in the project vicinity. A Flora and Fauna Survey was prepared for the proposed project and included in the Draft EA. There were no endangered Hawaiian hoary bats recorded during the survey. However, it was noted that if they were found in the project area, that the U.S. Fish and Wildlife Service has guidelines for their protection which the Applicant will abide by. Further, timing of project site clearing will avoid the bat birthing and pup rearing season (June 1 to September 15) and the Applicant agrees to avoid the use of barbed wire during new construction.

It is noted that the project's Flora and Fauna Survey did not find the Blackburn's Sphinx Moth (BSM) nor were any host plants identified on the site. The Applicant will coordinate with the DOFAW to determine if the BSM is present and whether a vegetation survey

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Russel Y. Tsuji, Land Administrator May 16, 2022 Page 2

should be conducted. As recommended, the Applicant will remove plants less than one (1) meter in height during the dry time of year.

The Flora and Fauna survey reported that no native bird species (including the Nēnē) were found at the project area during the two (2) site visits to complete the survey. Nevertheless, if any Nēnē are present during construction activities, all activities within 100 feet will stop until the birds have left the area on their own accord. As noted in the Draft EA, the Applicant will shield all significant outdoor lighting downward to minimize disorientation of any native seabirds flying overhead.

The Applicant will minimize movement of plant or soil material between worksites so as to avoid the spread of invasive plant and animal species. The recommended measures as listed in DOFAW's letter will be followed by the Applicant, including cleaning of all equipment, materials, and personnel and consultation with the Maui Invasive Species Committee prior to construction. Lastly, the Applicant will try to incorporate as many appropriate native plant species into landscaping at the project site, and avoid using any invasive species.

LAND DIVISION - MAUI DISTRICT

We acknowledge that the Land Division-Maui District of the DLNR does not have any additional comments on the proposed project. Comments were received during the early consultation process and included in the Draft EA.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

Robert Hobdy, Biologist

Stacy Otomo, Otomo Engineering, Inc.

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DAVID Y. IGE GOVERNOR



STATE OF HAWAII DEPARTMENT OF PUBLIC SAFETY

1177 Alakea Street Honolulu, Hawaii 96813 MAX N. OTANI DIRECTOR

Maria C. Cook Deputy Director Administration

Tommy Johnson Deputy Director Corrections

Jordan Lowe Deputy Director Law Enforcement

No. 2021-3587

October 14, 2021

Charlene Shibuya Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Subject: Draft Environmental Assessment for the Kuikahi Affordable Housing Project at

TMK No. (2)3-5-002:003(por); Wailuku, Maui, Hawaii

Dear Ms. Shibuya:

In response to your letter dated October 5, 2021, we reviewed the Draft Environmental Assessment for the Kuikahi Affordable Housing Project and have no comments at this time.

If you or your staff have any questions, please contact Mr. Wayne Takara, Chief Planner, at 587-3463.

Sincerely,

Max N. Otani

Director

c: Buddy Almeida, County of Maui, Department of Housing and Human Concerns



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Max N. Otani, Director State of Hawai'i Department of Public Safety 1177 Alakea Street Honolulu, Hawai'i 96813

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawaiii

Dear Mr. Otani:

Thank you for your letter dated October 14, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge that the Department has no comments on the proposed project.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC

Lawrence Carnicelli, Alaula Builders

 $K:\DATA\WV\ Regenesis\Wailuku\ AH\Applications\Response\ Letters-2.97\ and\ DEA\NS\ Comments\DPS.docx$

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

DAVID Y. IGE GOVERNOR



STATE OF HAWAII DEPARTMENT OF TRANSPORTATION 869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

October 19, 2021

JADE T. BUTAY DIRECTOR

Deputy Directors DEREK J CHOW ROSS M HIGASHI EDWIN H SNIFFEN

DIR 0972 STP 8.3275

Ms. Lori Tsuhako Director Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Attention: Mr. Buddy Almeida, Housing Administrator

Dear Ms. Tsuhako:

Subject:

Draft Environmental Assessment (EA)

Kuikahi Affordable Housing Project

Wailuku, Maui, Hawaii

Tax Map Key: (2) 3-5-002:003 (por.)

The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject Draft EA and understands Kuikahi Properties, LLC is proposing to develop a new residential community to include 204 affordable residential units on approximately 14.9-acres in Wailuku, Maui. Other related improvements include onsite parking, bike paths, spot parks and a playground.

The project site is accessible via two new driveways on Kuikahi Drive, which is under the County of Maui's jurisdiction. One of the proposed driveways, located at the Kuikahi Drive and Kehalani Mauka Parkway intersection is 0.5 miles away from the intersection of Kuikahi Drive and Honoapiilani Highway (State Route 30).

HDOT has the following comments:

Airports Division (HDOT-A)

The Draft EA sufficiently addresses HDOT-A's prior concerns with the project.

Highways Division (HDOT-HWY)

- 1. Based on the following key findings of the TIAR, no significant adverse impact to State highways is anticipated and no mitigation is warranted:
 - a. The following are four of the seventeen intersections in the study area involving Honoapilani Highway:

- Intersection 13, Kehalani Parkway, provides access to Puu Kukui Elementary School, highway milepost (MP) 0.8.
- Intersection 14, Kuikahi Drive, MP 1.
- Intersection 15, Pilikana Street, MP 1.9.
- Intersection 16, West/East Waiko Road, MP 2.2.
- b. All four intersections with Honoapiilani Highway and Intersection 17 (Kuikahi Drive and Kehalani Mauka Parkway) currently operate at acceptable Levels of Service (LOS) C or better, during peak traffic hours. The eastbound left-turning movement at Kehalani Parkway operates at LOS D in the A.M. Puu Kukui Elementary School traffic.
- c. Full project build-out would occur in 2024. The 2024 base year includes trips generated by fifteen other development projects planned in the study area, and an anticipated 1.9 percent per year population growth rate.
- d. The roundabout under consideration at Kehalani Mauka Parkway and Kuikahi Drive is not included in the 2024 base year traffic conditions; however, the following County roadway improvement projects were included: a new Maui Lani Parkway (MLP) and Kamehameha Highway intersection roundabout, a new Waiale Road and Waiinu Road roundabout, and improved traffic signal timing Waiale Road and Kuikahi intersection. The 2024 base year traffic analysis included two scenarios for the planned MLP Extension: with and without.
- e. Under 2024 base year conditions with or without the MLP extension, Intersection 17 and the four Honoapiilani intersections would continue to operate at overall acceptable LOS D or better. Specific turning movements at the following Honoapiilani Highway intersections would decline to LOS E:
 - Intersection 13, during A.M. peak hour traffic, related to Puu Kukui Elementary School traffic.
 - Intersection 14, during P.M. peak hour traffic.
- f. The project would generate a total of 102 A.M. and 116 P.M. peak traffic hour trips. Based on the trip distribution, there would be only 2 to 22 project-related trips per direction per peak traffic hour on Honoapiilani Highway.
- g. Year 2024 traffic with the project, and with or without the MLP extension, are similar to the 2024 base year conditions at the four Honoapiilani Highway intersections and all movements would operate below capacity. The two new access driveway intersections would operate at acceptable LOS B or greater, in 2024 and no traffic signal is warranted.
- h. The MLP extension would significantly improve 2024 County Road traffic conditions, with or without the project.

- 2. The site plan shows a Pedestrian and Bike Path aligned generally north-south through the site that terminates at Kuikahi Drive. The Landscape Plan describes the route as a Bike Path and at Kuikahi Drive, the path extends east and west parallel to Kuikahi Drive and terminates at each of the proposed access driveways, within the project boundary. The Final EA should clarify the intended use and alignment of the path, and verify the entire path is within the project boundary. The Final EA graphics should clearly identify the location of the proposed Kuikahi Drive pedestrian crosswalk(s) and interconnections with existing and planned bike/pedestrian routes in the vicinity. A safe pedestrian crossing of Kuikahi Drive from the proposed bike/pedestrian path, may encourage walking versus driving to Puu Kukui Elementary School, resulting in a potential beneficial impact on the Honoapiilani Highway and Kehalani Parkway intersection traffic conditions.
- 3. The HDOT supports travel demand management strategies such as the proposed multimodal interconnectivity with adjacent parcels, the shaded paths, and the work-live units. These and other strategies may justify a reduction in parking spaces required, through exemption from County codes.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

JADE T. BUTAY

Director of Transportation

c: Ms. Charlene Shibuya, Munekiyo Hiraga



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Jade Butay, Director State of Hawai'i Department of Transportation 869 Punchbowl Street Honolulu, Hawai'i 96813-5097

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-002:003 (por.), Wailuku, Maui, Hawai'i (DIR 0972, STP 8.3275)

Dear Mr. Butay:

Thank you for your letter dated October 19, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

AIRPORTS DIVISION (HDOT-A)

Comment #1:

The Draft EA sufficiently addresses HDOT-A's prior concerns with the project.

Response: We acknowledge and appreciate the HDOT-A's confirmation that its prior concerns have been addressed by the Applicant.

HIGHWAYS DIVISION (HDOT-HWY)

Comment #1:

- 1. Based on the following key findings of the TIAR, no significant adverse impact to State highways is anticipated and no mitigation is warranted:
 - a. The following are four of the seventeen intersections in the study area involving Honoapilani Highway:

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

- Intersection 13, Kehalani Parkway, provides access to Puu Kukui Elementary School, highway milepost (MP) 0.8.
- Intersection 14, Kuikahi Drive, MP 1.
- Intersection 15, Pilikana Street, MP 1.9.
- Intersection 16, West/East Waiko Road, MP 2.2.
- b. All four intersections with Honoapiilani Highway and Intersection 17 (Kuikahi Drive and Kehalani Mauka Parkway) currently operate at acceptable Levels of Service (LOS) C or better, during peak traffic hours. The eastbound left-turning movement at Kehalani Parkway operates at LOS D in the A.M. Puu Kukui Elementary School traffic.
- c. Full project build-out would occur in 2024. The 2024 base year includes trips generated by fifteen other development projects planned in the study area, and an anticipated 1.9 percent per year population growth rate.
- d. The roundabout under consideration at Kehalani Mauka Parkway and Kuikahi Drive is not included in the 2024 base year traffic conditions; however, the following County roadway improvement projects were included: a new Maui Lani Parkway (MLP) and Kamehameha Highway intersection roundabout, a new Waiale Road and Waiinu Road roundabout, and improved traffic signal timing Waiale Road and Kuikahi intersection. The 2024 base year traffic analysis included two scenarios for the planned MLP Extension: with and without.
- e. Under 2024 base year conditions with or without the MLP extension, Intersection 17 and the four Honoapiilani intersections would continue to operate at overall acceptable LOS D or better. Specific turning movements at the following Honoapiilani Highway intersections would decline to LOS E:
 - Intersection 13, during A.M. peak hour traffic, related to Puu Kukui Elementary School traffic.
 - Intersection 14, during P.M. peak hour traffic.
- f. The project would generate a total of 102 A.M. and 116 P.M. peak traffic hour trips. Based on the trip distribution, there would be only 2 to 22 project-related trips per direction per peak traffic hour on Honoapiilani Highway.

Jade Butay, Director May 16, 2022 Page 3

- g. Year 2024 traffic with the project, and with or without the MLP extension, are similar to the 2024 base year conditions at the four Honoapiilani Highway intersections and all movements would operate below capacity. The two new access driveway intersections would operate at acceptable LOS B or greater, in 2024 and no traffic signal is warranted.
- h. The MLP extension would significantly improve 2024 County Road traffic conditions, with or without the project.

Response: We acknowledge the SDOT's confirmation of the information that was included in the Project's Traffic Impact Analysis Report (TIAR).

Comment #2:

2. The site plan shows a Pedestrian and Bike Path aligned generally north-south through the site that terminates at Kuikahi Drive. The Landscape Plan describes the route as a Bike Path and at Kuikahi Drive, the path extends east and west parallel to Kuikahi Drive and terminates at each of the proposed access driveways, within the project boundary. The Final EA should clarify the intended use and alignment of the path, and verify the entire path is within the project boundary. The Final EA graphics should clearly identify the location of the proposed Kuikahi Drive pedestrian crosswalk(s) and interconnections with existing and planned bike/pedestrian routes in the vicinity. A safe pedestrian crossing of Kuikahi Drive from the proposed bike/pedestrian path, may encourage walking versus driving to Puu Kukui Elementary School, resulting in a potential beneficial impact on the Honoapiilani Highway and Kehalani Parkway intersection traffic conditions.

Response:

Thank you for your comment regarding the Pedestrian and Bike Path for the proposed project. The Final EA has been updated to clarify additional information on the intended use and alignment of the path, as well as confirm that the path is within the project's boundary. Figure 3 of the Final EA has been revised to include the location of the Ku'ikahi Drive pedestrian crosswalks and interconnections. See attached **Exhibit "A"**.

Jade Butay, Director May 16, 2022 Page 4

Comment #3:

3. The HDOT supports travel demand management strategies such as the proposed multimodal interconnectivity with adjacent parcels, the shaded paths, and the work-live units. These and other strategies may justify a reduction in parking spaces required, through exemption from County codes.

Response: We appreciate the SDOT's guidance on travel demand management strategies. The Applicant plans to incorporate multimodal transportation options for project residents to the extent possible. The proposed project includes walking paths between the various residential units and parks as well as a bikeway which connects to the existing bike lane on Ku'ikahi Drive.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab Attachment

Linda Munsell, County of Maui, Department of Housing and Human Concerns CC: (w/attachment)

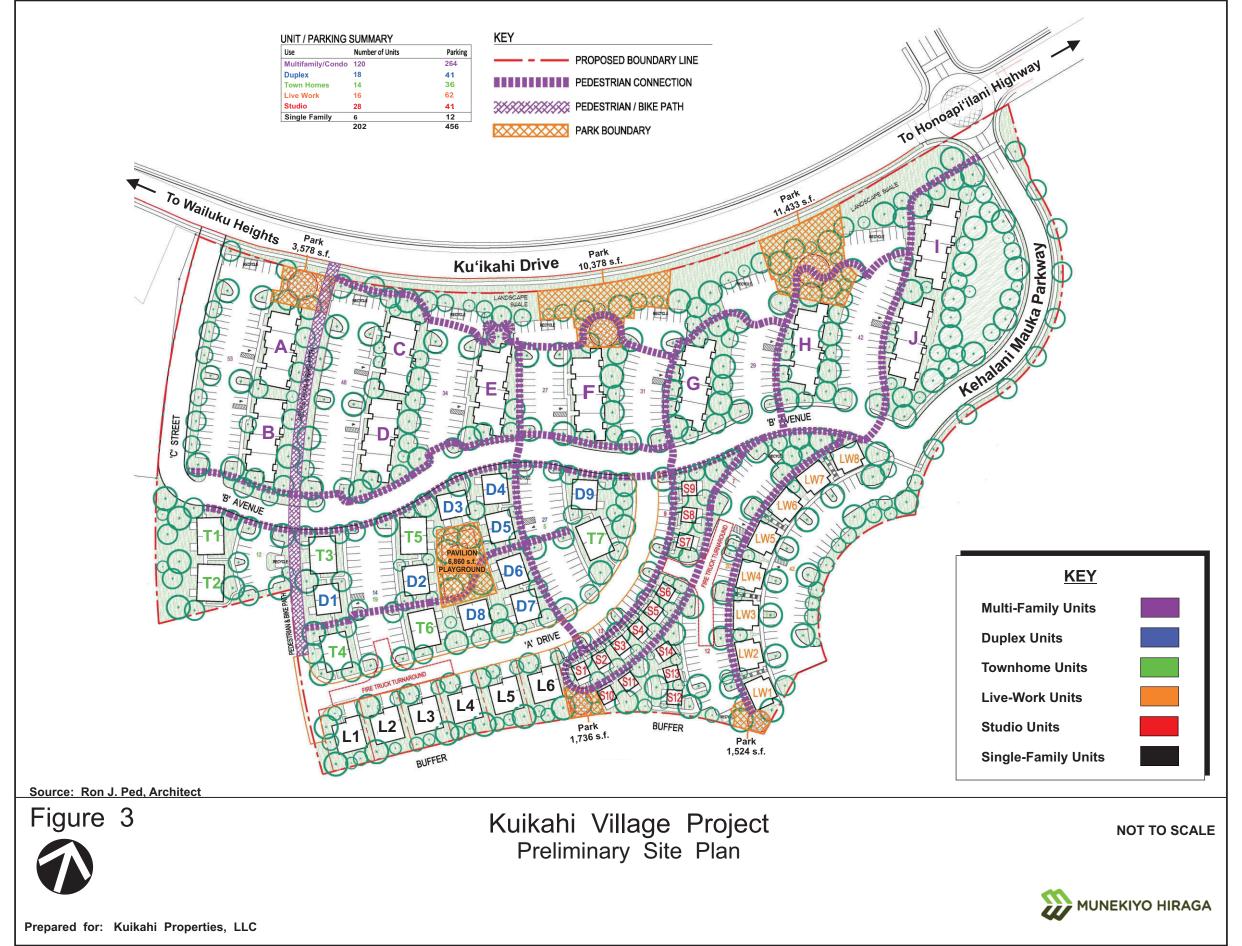
Doyle Betsill, Kuikahi Properties, LLC (w/attachment)

Lawrence Carnicelli, Alaula Builders (w/attachment) Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc. (w/attachment)

Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc. (w/attachment)

Stacy Otomo, Otomo Engineering, Inc. (w/attachment) K:\DATA\WV Regenesis\Wailuku AH\Applications\Response Letters - 2.97 and DEA\Subst Comments\SDOT.docx

EXHIBIT "A". UPDATED SITE PLAN





October 25, 2021

Via email:

County of Maui, Department of Housing & Human Concerns 2200 Main Street, Suite 546 Wailuku, HI 96793

Attention: Ms. Lori Tsuhako, Director (director.hhc@mauicounty.gov)

Re: Draft Environmental Assessment

Proposed Kuikahi Affordable Housing Project, Wailuku, Maui, Hawai'i

Tax Map Key No. (2) 3-5-002:003 (por.)

Dear Ms. Tsuhako:

Thank you for the opportunity to comment on the draft EA for the proposed Kuikahi Affordable Housing project referenced above (published October 8, 2021), specifically with respect to issues and concerns regarding light pollution.

The University of Hawai'i Institute for Astronomy (IfA) conducts research in astronomy using telescopes located on Haleakalā and Maunakea and operated by IfA and our partner institutions. Both Haleakalā and Maunakea are among the best sites in the world for astronomical facilities because of their elevation, clear skies, favorable atmospheric conditions, and low levels of light pollution. Hawai'i-based observatories have played major roles in the advancement of astronomy and astrophysics for over 50 years and are well positioned to remain at the forefront of astronomical research for decades to come.

Because of the outstanding quality and productivity of these facilities, IfA is acutely concerned about negative impacts on astronomy from increased light pollution. Our work to combat light pollution has also brought us into contact with others concerned about light pollution for other reasons, including impacts on wildlife (particularly seabirds) and on human health. While IfA's comments focus on the impacts of light pollution on astronomy, appropriate mitigation measures also help to reduce non-astronomy impacts.

With that background, we offer the following comments:

Any new or additional artificial light at night has an adverse effect on astronomical observations by increasing the night sky brightness. All observations performed by the Pan-STARRS observatories, the ATLAS telescope, and the Faulkes telescope on Haleakalā are sky-background

adversely affected. Some of the observations performed by the Air Force telescopes atop Haleakala are also skylimited. This means that there is a natural sky brightness coming from airflow and zodiacal light. background limited, so those observations, performed for national defense purposes, will also be Artificial light increases the sky brightness, thereby decreasing the sensitivity of the telescopes.

Appropriate general steps to reduce the impact on the observatories would include:

- activated lighting is strongly preferred. The minimum possible amount of outdoor lighting should be used. Motion sensor
- 2 fully shielded. This means that all lighting fixtures must emit zero light above the Any outdoor lighting must follow the Maui County lighting ordinance. All lighting must be horizontal plane.
- ည light at wavelengths that is very damaging to astronomy. fluorescent lights also must be avoided. Both of these types of lamps use mercury and emit circumstances should high-intensity discharge lamps such as metal halide be used; exclusively selected. The best choices are filtered LED lights, or amber LED lights. Under no Blue light is most harmful to the observatories, so blue-deficient lighting should be
- 4. to astronomy. White light should always have a Correlated Color Temperature of 2700 K White light should be avoided because the blue component of white light is very damaging

with the University regarding light pollution on Maui, and a strong need for revision of the present generally also tend to reduce impacts on astronomy, and would encourage similar attention to light pollution issues more generally. Finally, we note that there is a strong need for further dialog We appreciate the DEA's comments about minimizing lighting impacts on seabirds, which lighting ordinance to properly address the impacts of changes in lighting technology including LED

undersigned or Richard Wainscoat (rjw@hawaii.edu). questions or need further detail regarding these comments, please do not hesitate to contact the Thank you for your consideration of these comments and attention to IfA's concerns. If you have

Very truly yours,

Doug Simons
Director

 \mathbb{C} Ms. Charlene Shibuya, Munekiyo Hiraga (charlene@munekiyohiraga.com) Mr. John Varel, Kuikahi Properties, LLC (doyle@alaula.org)



Karlynn K. Fukuda PRESIDENT Mark Alexander Roy AICP, LEED AP VICE PRESIDENT Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

VICE PRESIDENT

May 16, 2022

241

Doug Simmons, Director University of Hawai'i at Manoa Institute for Astronomy 2680 Woodlawn Drive Honolulu, Hawai'i 96822

> SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

> > Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Mr. Simmons:

Thank you for your letter dated October 25, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

1. **Comment:** Any new or additional artificial light at night has an adverse effect on astronomical observations by increasing the night sky brightness. All observations performed by the Pan-STARRS observatories, the ATLAS telescope, and the Faulkes telescope on Haleakalā are sky-background limited. This means that there is a natural sky brightness coming from airflow and zodiacal light. Artificial light increases the sky brightness, thereby decreasing the sensitivity of the telescopes. Some of the observations performed by the Air Force telescopes atop Haleakala are also sky-background limited, so those observations, performed for national defense purposes, will also be adversely affected.

Response: We appreciate the IfA's information regarding the impacts of artificial lights at night on astronomical observation conditions. The Applicant will comply with the County of Maui Outdoor Lighting Ordinance including shielding all significant outdoor lighting downward to minimize light pollution resulting from the proposed project.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

- **2.** <u>Comment:</u> Appropriate general steps to reduce the impact on the observatories would include:
 - 1. The minimum possible amount of outdoor lighting should be used. Motion sensor activated lighting is strongly preferred.
 - 2. Any outdoor lighting must follow the Maui County lighting ordinance. All lighting must be fully shielded. This means that all lighting fixtures must emit zero light above the horizontal plane.
 - 3. Blue light is most harmful to the observatories, so blue-deficient lighting should be exclusively selected. The best choices are filtered LED lights, or amber LED lights. Under no circumstances should high-intensity discharge lamps such as metal halide be used; fluorescent lights also must be avoided. Both of these types of lamps use mercury and emit light at wavelengths that is very damaging to astronomy.
 - 4. White light should be avoided because the blue component of white light is very damaging to astronomy. White light should always have a Correlated Color Temperature of 2700 K or below.

Response: As previously noted, all outdoor lighting will comply with the Maui County Outdoor Lighting Ordinance to minimize light pollution from the project.

3. <u>Comment:</u> We appreciate the DEA's comments about minimizing lighting impacts on seabirds, which generally also tend to reduce impacts on astronomy, and would encourage similar attention to light pollution issues more generally. Finally, we note that there is a strong need for further dialog with the University regarding light pollution on Maui, and a strong need for revision of the present lighting ordinance to properly address the impacts of changes in lighting technology including LED lighting.

Response: We appreciate the IfA's comments regarding light pollution issues on Maui.

Doug Simmons, Director May 16, 2022 Page 3

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

Ron Ped, Ronald James Ped Architect, PC

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MICHAEL P. VICTORINO Mayor

HERMAN ANDAYA Administrator





County of Maui MAUI EMERGENCY MANAGEMENT AGENCY

200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAI'I 96793 PH: (808) 270-7285

emergency.management@mauicounty.gov

November 8, 2021

Buddy Almeida County of Maui Housing Administrator Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, HI 96793

Mr Almeida,

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT AND MAUI COUNTY CODE 2.97 APPLICATION FOR THE KUIKAHI AFFORDABLE HOUSING PROJECT AT TMK (2)3-5-002:003 (por), WAILUKU, MAUI HAWAII

Thank you for your proposal and the opportunity for us to submit suggestions and comments on the proposed Draft Environmental Assessment for the Kuikahi Affordable Housing Project. We have read the Draft Environmental Assessment request and have offered some comments and considerations for your convenience below.

- 1.) The location of the proposed project is located south of the Wailuku Water Reservoir #10. This reservoir is 52 ft. high, 880 ft. length and has a drainage area of 0.27 sq. miles (172 acres). It is an earthen dam and according to the State of Hawaii (dams.hawaii.gov) it is used for irrigation. The spillway type is culvert. The owners are Kuikahi Properties LLC. This is a state regulated dam.
- 2.) Maui County Emergency Management Agency is recommending an update to the Emergency Action Plan for this dam. The most current EAP was updated on 10/24/2019. The Dam is situated at a north/south position in regards to the length of the reservoir, but its drainage is Makai. Due to the location of the project





and the reservoir, there is a concern that drainage downstream may become an issue, causing loss of life and damage to property if the dam did breach or there was an imminent failure. To exuberate the situation, there is a water tank Makai that could become damaged and adding additional water to the downstream flow.

Thank you for allowing us to make our suggestions to your project. Should you have any questions please feel free to contact Gina Albanese (808) 270-7276, or via email at Herman.Andaya@co.maui.hi.us

Sincerely,

Herman Anda

MEMA Administrator







Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Herman Andaya, Administrator Maui Emergency Management Agency County of Maui 200 South High Street Wailuku, Hawaii 96793

SUBJECT:

Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment for

the Proposed Kuikahi Village Project at TMK (2)3-5-002:003 (por.), Wailuku,

Maui, Hawai'i

Dear Mr. Andaya:

Thank you for your letter dated November 8, 2021 providing the Maui Emergency Management (MEMA) comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter.

The Applicant owns the land that Reservoir #10 is situated on and the Wailuku Water Company has an easement for the reservoir discharges ditch flow into the reservoir. The two (2) parties are working together to satisfy all requirements for Reservoir #10 that are regulated by the Department of Land and Natural Resources.

Also, the County Department of Public Works (DPW) has a drainage system that discharges storm waters from the Wailuku Heights Subdivision into Reservoir #10. DPW met with the Applicant to initiate discussions on a project to redirect flows into a new, adequately sized retention basin.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders Stacy Otomo, Otomo Engineering, Inc.

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Subject: FW: Request For Comment: Draft Environmental Assessment - Kuikahi Affordable

Housing

Attachments: 10.05.2021 - RFC Letter - EA Kuikahi Residential Project.pdf

From: Fire Prevention < <u>Fire.Prevention@co.maui.hi.us</u>>

Sent: Wednesday, October 20, 2021 8:26 AM

To: Buddy Almeida < Buddy. Almeida@co.maui.hi.us >; General eMail < planning@munekiyohiraga.com >

Subject: Request For Comment: Draft Environmental Assessment - Kuikahi Affordable Housing

Aloha, Good Morning ~

Please see the attached comment for: Draft Environmental Assessment - Kuikahi Affordable Housing

Mahalo,

Fire Prevention Bureau 313 Manea Pl. Wailuku, HI 96793 Office: 808 876-4690

Fax: 808 876-4646



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy

Tessa Munekiyo Na VICE PRESIDENT

Michael T. Munekiyo SENIOR ADVISOR

October 5, 2021

Bradford Ventura, Chief County of Maui Department of Fire and Public Safety 200 Dairy Road Kahului, HI 96732

SUBJECT: Draft Environmental Assessment and Maui County Code 2.97

Application for the Kuikahi Affordable Housing Project at TMK (2)3-

5-002:003 (por.), Wailuku, Maui Hawai'i

Dear Chief Ventura:

On behalf of the County of Maui, Department of Housing and Human Concerns, enclosed for your review and comment is the Draft Environmental Assessment (EA) and County of Maui, Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the Kuikahi Affordable Housing Project.

We would appreciate receiving any comments you may have on the Draft EA and Chapter 2.97 Application no later than November 8, 2021.

Please send your comments to the following:

Approving Agency: County of Maui

Address

Department of Housing and Human Concerns

2200 Main Street, Suite 546 Wailuku Hawai'i 96793

Contact Person:

Buddy Almeida, Housing Administrator

Buddy.Almeida@co.maui.hi.us

(808) 270-7805

In addition, may we ask that a copy of your comments be sent to the following:

Consultant:

Munekiyo Hiraga

Address:

305 High Street, Suite 104

Wailuku, Hawai'i 96793

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

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Bradford Ventura, Chief October 5, 2021 Page 2

Contact Person:

Charlene Shibuya, Senior Associate

planning@munekiyohiraga.com

(808) 244-2015

Thank you for your participation in the review of this project. Should you have any questions, please feel free to call me at 244-2015.

Very truly yours,

Charlene Shibuya Senior Associate

CSS:ab Enclosure

CC:

Buddy Almeida, Department of Housing and Human Concerns (w/o enclosure)

Doyle Betsill, Kuikahi Properties, LLC (w/o enclosure)

Lawrence Carnicelli, Kuikahi Properties, LLC (w/o enclosure)

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County of Maui Department of Fire and Public Safety

Thank you for the opportunity to review your project. At this time Fire Prevention Bureau has no comments.

Our office does reserve the right to comment on the proposed project during the building permit review process when detailed plans for this project are routed to our office for review. At that time, fire apparatus access, water supply for the fire protection, and fire and life safety requirements associated with the subject project will be formally reviewed.

Should you have any specific fire related public safety concerns please identify those to us on this or any future projects you would like us to review.

Plans Review - Fire Prevention Bureau Fire.Prevention@mauicounty.gov



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Bradford Ventura, Chief County of Maui Department of Fire and Public Safety 200 Dairy Road Kahului, Hawaii 96732

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment and Application for Maui County Code Chapter 2.97 Approval for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Chief Ventura:

Thank you for your Department's email dated October 20, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) as well as the Application for Maui County Code Chapter 2.97 Approval for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge that the Department has no comments on the proposed project, but does reserve the right to comment on the project during the building permit review process.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

MICHAEL P. VICTORINO Mayor

KARLA H. PETERS Director

MARCI M. SATO Deputy Director





DEPARTMENT OF PARKS AND RECREATION

700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawai'i 96793 Main Line (808) 270-7230 / Facsimile (808) 270-7942

MEMORANDUM

TO: Lori Tsuhako, Director

Department of Housing and Human Concerns

FROM: Karla H. Peters, Director

DATE: October 20, 2021

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT AND MAUI COUNTY CODE 2.97

APPLICATION FOR THE KUIKAHI AFFORDABLE HOUSING PROJECT AT

TMK: (2) 3-5-002:003 (POR.), WAILUKU, MAUI, HAWAII

Thank you for the opportunity to review the proposed Kuikahi Affordable Housing Project. In review of the project, we note that the applicant is currently proposing to develop 204 affordable housing units and is planning to apply for Maui County Code Chapter 2.97 approval from the Maui County Council for the proposed development.

The Department of Parks and Recreation looks forward to reviewing the final application for compliance with Maui County Code 18.16.320. We have no further comments at this time.

Should you have any questions or concerns, please feel free to contact me or Samual Marvel, Chief of Planning and Development, at (808) 270-6173.

c: Buddy Almeida, Housing Administrator Samual Marvel, Chief of Planning and Development Charlene Shibuya, Munekiyo Hiraga

KHP:SM:csa



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Karla Peters, Director County of Maui Department of Parks & Recreation 700 Hali'a Nakoa Street, Unit 2F Wailuku, Hawai'i 96793

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment and Application for Maui County Code Chapter 2.97 Approval for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawaiii

Dear Ms. Peters:

Thank you for your letter dated October 20, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) as well as the Application for Maui County Code Chapter 2.97 Approval for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge that the Department has no comments on the proposed project at this time, but looks forward to reviewing the final Maui County Code Chapter 2.97 application for compliance with Maui County Code, Chapter 18.16.320.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

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Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

MICHAEL P. VICTORINO Mayor

MICHELE CHOUTEAU MCLEAN, AICP Director

> JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

COUNTY OF MAUI ONE MAIN PLAZA 2200 MAIN STREET, SUITE 315 WAILUKU, MAUI, HAWAII 96793

December 7, 2021

Mr. Buddy Almeida County of Maui Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Hawaii 96793

Dear Mr. Almeida:

SUBJECT: REQUEST FOR COMMENT ON THE DRAFT

ENVIRONMENTAL ASSESSMENT (DEA) FOR THE PROPOSED KUIKAHI AFFORDABLE RESIDENTIAL PROJECT, LOCATED IN WAILUKU, MAUI, HAWAII; TMK: (2) 3-5-002:003 (POR.)

(EAC 2021/0007)

The Department of Planning (Department) is in receipt of the Applicant's October 5, 2021, Request for Comment on the Draft Environmental Assessment (DEA) for the proposed Kuikahi Affordable Residential Housing Project (Project) to be processed pursuant to Chapter 2.97, Maui County Code (MCC). The Urban Design Review Board (UDRB) reviewed the Project on November 2, 2021. After hearing public testimony and deliberation, the UDRB offered comments that have already been provided.

The Maui Planning Commission (Commission) reviewed the Project on November 25, 2021. After hearing public testimony and deliberation, the Commission offered comments, detailed below. The Department also offers its comments.

Commission Comments:

- 1. The multiple types of housing included in the project are appreciated.
- 2. The central playground and pavilion are appreciated.
- 3. The project site is valuable for agriculture and best suited for farming. The land is fertile and has easy access to water, more so than the other agricultural land in the area. The land has historically been highly productive servicing large populations.
- 4. Provide a detailed description of the project's drainage to ensure the resulting stormwater from the project will not impact any existing or future neighbors, and to ensure the ditch parallel to the road will not overflow and result in damage to any of the proposed units.
- 5. Limit the heights of all structures to be no higher than 40 feet.
- 6. Ensure the spot parks are adequate in size.

- 7. Ensure the number of parking stalls are listed consistently throughout the DEA.
- 8. Require a 20 year minimum duration of ownership for all units.
- 9. If an exemption from the required sidewalks along Kuikahi Drive is pursued, provide safe connections to the sidewalks across Kuikahi Drive, such as by adding crosswalks and cuts to the existing sidewalk.
- 10. Provide only native plants or multi-purpose plants in the landscaping so that all plants are useful beyond aesthetics, such as for lei, food, practical uses, etc.
- 11. The project is described as an infill action when it does not meet the definition of infill development.
- 12. State the anticipated population of residents for the project.
- 13. Further describe the commercial component within the project. Provide further analysis of what businesses will be there and who they will serve.
- 14. State how many children are anticipated to reside in the project. The schools cited in the DEA are exceeding capacity and so further consideration to accommodate the increase in children to the schools in the area must be addressed.
- 15. State how the project will affect the existing streams/ditches on the property.
- 16. If the stream is traditionally the boundary for an ahupua'a, it should be highlighted in the DEA.
- 17. The roadway system is designed to connect to future development. State what secondary and cumulative impacts may result due to the future growth around the project.
- 18. Further analysis of the prime and Class A agriculture land is required when quality agriculture land will be eliminated. There were some who consider this to be the best land on the planet and it has historically been known as the bread basket for Maui and even the breadbasket for all of Hawaii, so converting this agriculture land for the project must be better justified.
- 19. Maintain the greenbelt to separate Waikapu from Wailuku.
- 20. Only a portion of the project is in the Urban Growth Boundary so further justification is required for going beyond that boundary.
- 21. Land with agricultural value is far more important than for housing because feeding the population takes priority over adding more housing when it can be added on less agriculturally productive land.

- 22. Traffic is already congested in the neighborhood and this could add to that traffic congestion. This will add more traffic at the bottom of Kuikahi which will be a concern.
- 23. The project site receives rain almost daily. Creating impervious surfaces like the project proposes could inhibit aquifer recharge. Impervious surfaces may reduce cloud formation and reduce rainfall. Provide further studies to ensure the aquifer will not be affected.
- 24. The impervious surfaces caused by the development will become the problem of the neighbors below, so surface water runoff must be mitigated within the project site.
- 25. Because the project site is within the habitat range for the Blackburn's Sphinx Moth, the potential impacts to the moth's habitat must be addressed in the DEA.
- 26. This is potential habitat for the 'Ope'ape'a, or Hawaiian Hoary Bat, as they roost in tall trees and this may be part of their migratory path and should be considered in the DEA.
- 27. Because the project is under 15 acres, it will not go before the State Land Use Commission; they should be consulted on the impacts this project will have on the schools in the area.
- 28. Confer with local community groups and organizations that are knowledgeable of the area to see what impacts the project might have. Include Aha Moku O Wailuku, Aha Moku O Maui, Malama Kakanilua, Hui Na Wai 'Eha, and the Hawaii Farmer's Union United's Mauna Kahalawai Chapter.
- 29. Provide a comprehensive plan that includes anticipated growth and the consequential impacts to the area, such as increasing vehicular traffic and reducing agricultural land available for food production.
- 30. Provide affordable workforce housing long-term rental units in the project.

Department Comments:

- 1. Include the dimensions of the structures in the DEA and in Exhibit illustrations. Listing the number of stories for the structure, without their heights, is not sufficient to determine potential impacts.
- On page 175 (Vol I), the DEA states that there will be no adverse effect on Scenic and Open Space Resources because, "The proposed dwelling designs are consistent with other similar developments in the vicinity of the proposed project and will conform to the Maui County Zoning Code for single-family and multi-family structures." You are seeking exemption from the Maui County Zoning Code, and so this statement is not correct.

- 3. State in the DEA that no units will be used for any form of short-term rental use.
- 4. If the live/work units must be considered home businesses to qualify the project as 100% workforce housing, adjust the DEA to reflect this. The Applicant stated on record at the UDRB meeting that the home business spaces could be used by the owner as an accessory dwelling for long-term rental use. In the DEA, you must anticipate the chances that all live/work units could be used as accessory dwellings to determine potential impacts and ensure the number of housing units are appropriately reflected. This will change the number of dwellings approved for this project, the required parking, the population density, the traffic, and the impacts on infrastructure.
- 5. Though the Department does not recommend an exemption from the number of street trees planted, the Department is otherwise amenable to an exemption on landscaping requirements, but only to the extent that provides flexibility.
- 6. State the exact minimum residential lot area proposed for MCC, Section 19.30A exemption, not approximations.
- 7. The height must be measured from whatever is the lowest between the natural or finished grade. The exemptions requesting changes to maximum building heights, when the amount of fill is unspecified, could result in serious impacts. Raising the natural grade without regulation to an unspecified finished grade could result in excessive building elevation.
- 8. Ensure easily accessible bus stops are incorporated within the project.

Thank you for the opportunity to comment on the DEA for the Kuikahi Residential Project. Should require further clarification, please contact Staff Planner Jared Burkett jared.burkettt@mauicounty.gov or at (808) 270-7378.

Sincerely,

MICHELE MCLEAN, AICP

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Planning Director

Copy to: Clayton Yoshida, Planning Program Administrator (PDF)

Jacky Takakura, Acting Planning Program Administrator (PDF)

Kathleen Aoki, Planning Program Manager (PDF)

Jared Burkett, Staff Planner (PDF)

Charlene Shibuya, Munekiyo Hiraga (PDF)

Project File

MCM:CIY:JLB:lp

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Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP SENIOR ADVISOR

VICE PRESIDENT

May 16, 2022

Michele McLean, AICP, Director County of Maui Department of Planning 2200 Main Street, Suite 315 Wailuku, Hawai'i 96793

SUBJECT: Comments on Draft Environmental Assessment for Kuikahi Village

(a.k.a. Kuihahi Affordable Residential) Project, (TMK: (2)3-5-002:003

(por.)

Dear Ms. McLean:

Thank you for your letter dated December 7, 2021 regarding the proposed Kuikahi Village residential project, also known as the Kuikahi Affordable Residential project. The letter included comments from both the Maui Planning Commission (Commission) and the Department of Planning (Department) on the Draft Environmental Assessment (EA) for the project. We note that the Department has implemented a policy to have all affordable housing projects, which may require the preparation of a Chapter 343 Hawai'i Revised Statutes (HRS) EA document, to have the Draft EA reviewed by the respective Commission. The Commission's role in the Draft EA review, as the understood by the Applicant, Kuikahi Properties, LLC (Applicant), is to provide an additional opportunity for public comment during the Draft EA public review period. The Commission reviewed the Draft EA at the November 23, 2021 meeting. The Kuikahi Village Draft EA was published in the October 8, 2021 Environmental Review Program's Environmental Notice. While there was public testimony accepted on the Draft EA at the Commission meeting, it is our understanding that the comments provided in the December 7, 2021 letter are the comments of the Commission and the Department on the EA document.

On behalf of the Applicant, we provide the following responses to the comments on the proposed Kuikahi Village project. The responses follow the order of the comments in the letter. It is noted that the project is proposed as a 100 percent affordable housing project, for those persons earning between 60 percent to 140 percent of the Area Median Income (AMI).

www.munekiyohiraga.com

COMMISSION COMMENTS

Comment:

1. The multiple types of housing included in the project are appreciated.

Response: Thank you for the comment supporting the multiple types of housing in the proposed Kuikahi Village. The Applicant proposed the project to address the housing needs for a variety of family sizes in the community.

Comment:

2. The central playground and pavilion are appreciated.

Response: Thank you for the comment on the playground and pavilion. Although it is proposed as a 100 percent affordable housing project. the Applicant designed the Kuikahi Village project to include amenities it thought would be needed and important to the future residents.

Comment:

3. The project site is valuable for agriculture and best suited for farming. The land is fertile and has easy access to water, more so than the other agricultural land in the area. The land has historically been highly productive servicing large populations.

Response: We note the comment regarding the suitability of the site for agricultural purposes and "easy access" to water in order to provide for agricultural use of the property. It is noted that there currently is no agricultural water available for or designated for the site. Additionally, while the site was actively used for sugar cane in the past, active agricultural use of the property has ceased for at least 20 years. Lastly, we note that the project site as well as additional lands in the area, are designated within the Maui Island Plan (MIP) for the Urban and Rural Growth Boundaries.

Comment:

4. Provide a detailed description of the project's drainage to ensure the resulting stormwater from the project will not impact any existing or future neighbors, and to ensure the ditch parallel to the road will not overflow and result in damage to any of the proposed units.

Response:

The Draft EA included a copy of the Preliminary Engineering Report (PER), see Appendix "B". The PER provided a preliminary drainage plan with the plans for the drainage improvements for the project, including a large onsite drainage retention basin and grated inlet catch basins within the paved parking areas, which would convey runoff to perforated subsurface drain lines. The proposed drainage system is designed to "...accommodate more than the increase in the surface runoff volume from a 50-year, hour storm, created by the project." Refer to Appendix "B". After development of the project. there will be a decrease in runoff sheet flowing from the project site onto the downstream properties.

Comment:

5. Limit the heights of all structures to be no higher than 40 feet.

Response: Chapter IV, Requested Exemptions Pursuant to Chapter 2.97, MCC, of the Draft EA, included the table of proposed Maui County Code (MCC) Chapter 2.97 exemptions being requested for the project. Proposed Exemption 24 notes that the proposed design standards for the residential units would be "Height: No building shall exceed three-stories or 40 feet in height, measured from finished grade."

Comment:

6. Ensure the spot parks are adequate in size.

Response:

There are five (5) spot parks proposed totaling 27,125 square feet in size. In addition, the playground surrounding the pavilion is 6,860 square feet. Typically, small parks and playgrounds set within residential developments range from 900 square feet to 9,000 square feet in area.

Comment:

7. Ensure the number of parking stalls are listed consistently throughout the DEA.

Michele McLean, AICP, Director May 16, 2022 Page 4

> Thank you for the comment on the number of parking stalls. We will Response:

review the information as we prepare the Final EA and insure that

the numbers are consistently represented in the document.

Comment:

8. Require a 20 year minimum duration of ownership for all units.

Response: The minimum duration of ownership is set by the MCC Chapter 2.97.

Comment:

9. If an exemption from the required sidewalks along Kuikahi Drive is pursued, provide safe connections to the sidewalks across Kuikahi Drive, such as by adding crosswalks and cuts to the existing sidewalk.

Response:

The Applicant is proposing to provide a crosswalk along with necessary curb ramps at the Ku'ikahi Drive and project driveway, where the roundabout is proposed. There is no existing sidewalk on the south side of Ku'ikahi Drive.

Comment:

10. Provide only native plants or multi-purpose plants in the landscaping so that all plants are useful beyond aesthetics, such as for lei, food, practical uses, etc.

Response:

The Applicant reviewed the comment regarding landscaping and will work with its landscape architect to determine what native plants may be appropriate to include in the landscaping. Multi-purpose plants may also be considered for the project's landscaping. It is noted that the future homeowners will be responsible for maintaining the landscaping for the project.

Comment:

11. The project is described as an infill action when it does not meet the definition of infill development.

Michele McLean, AICP, Director May 16, 2022 Page 5

Response:

The Kuikahi Village project was noted as an infill project as there is existing residential homes to the west (Wailuku Heights) and north (Kehalani master plan area). There is planned residential use to the east, with the approved State of Hawaiii Department of Hawaiian Home Lands' Pu'unani Homestead. The Kuikahi Village project will respect the 500-foot greenway buffer to the south, provided for in the MIP. It is noted however, that beyond the 500-foot buffer, there are portions of existing residential developments in Waikapu. It is also noted that the MIP designated the project site, as well as additional lands, within the Urban and Rural Growth Boundaries.

Comment:

12. State the anticipated population of residents for the project.

Response: At full build out, the Applicant noted that the estimated number of residents for the Kuikahi Village is 588, as per the current Hawai'i Census Data.

Comment:

13. Further describe the commercial component within the project. Provide further analysis of what businesses will be there and who they will serve.

Response:

The proposed commercial component is to provide for live-work units, where there will be space provided at the ground level for business use, while the upper floors would be utilized for residential use. The Applicant is proposing that the types of businesses in the live-work units be businesses that comply with the MCC Chapter 19.67, Home Business.

Comment:

14. State how many children are anticipated to reside in the project. The schools cited in the DEA are exceeding capacity and so further consideration to accommodate the increase in children to the schools in the area must be addressed.

Response: The Applicant noted that the estimated number of children under the age of 18 that would reside at the Kuikahi Village is 192, as per the recent Hawaii Census Data.

Comment:

15. State how the project will affect the existing streams/ditches on the property.

Response:

The project's PER noted, "The existing southern drainageway will not be altered and offsite runoff will continue to sheet flow in a westerly direction as it is presently doing. Underground culverts will be installed along sections of the existing northern drainageway. The installation of the culverts will accommodate the construction of the structures and the parking areas." Refer to Appendix "B" of the Draft EA. The proposed underground culverts in the northern drainageway will be sized to accommodate the existing offsite and onsite flows.

Comment:

16. If the stream is traditionally the boundary for an ahupua'a, it should be highlighted in the DEA.

Response:

Scientific Consulting Services (SCS) reviewed the project site information relative to the possibility of the Kalapaokailio Stream as a boundary for the ahupua'a. See **Exhibit "A"** that shows the ahupua'a boundary line between Waikapu and Wailuku with the project area being completely within the Waikapu ahupua'a. Also, the boundary line appears to be along a ridge and not in a stream or gulch. In Appendix "D" of the DEA, the ahupua'a boundary line is shown in the Figure 1 map included for the Archaeological Inventory Survey prepared for the entire large parcel.

Comment:

17. The roadway system is designed to connect to future development. State what secondary and cumulative impacts may result due to the future growth around the project.

Response:

The Applicant does not have plans for the additional lands of Parcel 3 at this time. Should future development be planned for the additional acreage, the future project would need to comply with regulatory requirements in order to proceed.

Comment:

18. Further analysis of the prime and Class A agriculture land is required when quality agriculture land will be eliminated. There were some who consider this to be the best land on the planet and it has historically been known as the bread basket for Maui and even the breadbasket for all of Hawaii, so converting this agriculture land for the project must be better justified.

Response: As noted in the Draft EA, Parcel 3 was utilized for sugar cane cultivation until the early 2000's. Since the sugar cane use ceased on the property, there has been no agricultural production on the property. Further, we note that the Maui County Council adopted the MIP in 2012, which included Parcel 3 within the Urban and Rural Growth Boundaries. As such, the site has previously been reviewed and recognized as a site for future development.

Comment:

19. Maintain the greenbelt to separate Waikapu from Wailuku.

Response: Please see response to Comment No. 11.

Comment:

20. Only a portion of the project is in the Urban Growth Boundary so further justification is required for going beyond that boundary.

Response: We agree that only a portion of the proposed project area is within the Urban Growth Boundary, however, the remaining portion of the Kuikahi Village area is within the Rural Growth Boundary. Please see Figure 16 in the Draft EA.

Comment:

21. Land with agricultural value is far more important than for housing because feeding the population takes priority over adding more housing when it can be added on less agriculturally productive land.

Response: We note the Commission's comment on housing and other appropriate locations for housing. The Applicant does not own other properties where affordable housing could be built. Additionally, we note that there are other projects being proposed by other landowners and developers to address affordable housing. In the draft June 2021 Affordable Housing study commissioned by the Maui

Michele McLean, AICP, Director May 16, 2022 Page 8

County Council, it was noted that the Council had a goal of creating 5,000 new units, in order to meet the affordable housing needs of the community. The Kuikahi Village project was among the list of priority #1 projects to meet the housing goal.

Comment:

22. Traffic is already congested in the neighborhood and this could add to that traffic congestion. This will add more traffic at the bottom of Kuikahi which will be a concern.

Response:

The Draft EA included a Traffic Impact Analysis Report (TIAR) (Appendix "G"). The TIAR reviewed the potential impacts to traffic, with and without the proposed Kuikahi Village project. The TIAR noted that based on the analysis, two (2) mitigation measures were proposed, optimizing the signal timing at the Waiale Road/Kuʻikahi Drive intersection and to construct the mini-roundabout at the Kuʻikahi Drive/Kehalani Mauka Parkway/Proposed project access intersection. The State Department of Transportation, Highways Division, reviewed and agreed with the findings of the TIAR.

Comment:

23. The project site receives rain almost daily. Creating impervious surfaces like the project proposes could inhibit aquifer recharge. Impervious surfaces may reduce cloud formation and reduce rainfall. Provide further studies to ensure the aquifer will not be affected.

Response:

Please see responses to Comment No. 4 and No. 10. The Draft EA included a copy of the proposed landscape plan in Appendix "A", Preliminary Development plans. The Applicant is providing a landscape plan for the project that includes plants and trees throughout the project area.

Comment:

24. The impervious surfaces caused by the development will become the problem of the neighbors below, so surface water runoff must be mitigated within the project site.

Response:

Please see response to **Comment No. 4 and No. 15**. The project's drainage system will be sized to accommodate more than the increase in runoff from a 50-year, 1-hour storm. Therefore, the runoff that will sheet flow from the project site onto the downstream properties will be less than the existing condition.

Comment:

25. Because the project site is within the habitat range for the Blackburn's Sphinx Moth, the potential impacts to the moth's habitat must be addressed in the DEA.

Response: The Draft EA included a Flora and Fauna survey, see Appendix "C". The survey notes that no Blackburn Sphinx moth were identified during the survey of the property and further, no host plants were identified in the project area. The survey concluded that the moth's presence was unlikely because there were no host plants in the project area.

Comment:

26. This is potential habitat for the 'Ope'ape'a, or Hawaiian Hoary Bat, as they roost in tall trees and this may be part of their migratory path and should be considered in the DEA.

Response: The project's Flora and Fauna survey also did an evening site visit for the 'Opaeape'a. No activity was detected. Refer to Appendix "C". It is noted that the US Fish and Wildlife Service (USFWS) has commented on the Draft EA and the Applicant will follow the guidance provided by the USFWS.

Comment:

27. Because the project is under 15 acres, it will not go before the State Land Use Commission; they should be consulted on the impacts this project will have on the schools in the area.

Response: The Draft EA included comments received as part of the project's early consultation in preparation for the Draft EA. The State Land Use Commission provided a comment letter, which the Applicant responded to. See Chapter X of the Draft EA. It is noted that the State Department of Education also provided early consultation comments on the project, and the Applicant provided a response.

Comment:

28. Confer with local community groups and organizations that are knowledgeable of the area to see what impacts the project might have. Include Aha Moku 0 Wailuku, Aha Moku 0 Maui, Malama Kakanilua, Hui Na Wai 'Eha, and the Hawaii Farmer's Union United's Mauna Kahalawai Chapter.

Michele McLean, AICP, Director May 16, 2022 Page 10

Response:

The Applicant conducted outreach meetings with the Wailuku Heights II Community Association Board, the Waikapu Community Association (Board and members) and the Kehalani Community Association Board. The Applicant was later able to coordinate a meeting with the Aha Moku 'O Wailuku (AMOW) who sent in their comments and questions that the applicant responded to. AMOW was also asked to invite the Hui Na Wai 'Eha group who were not responding to our multiple requests to meet with them. AMOW members are also involved with the Malama Kakanilua that had representatives at the meeting.

Comment:

29. Provide a comprehensive plan that includes anticipated growth and the consequential impacts to the area, such as increasing vehicular traffic and reducing agricultural land available for food production.

Response:

An assessment of the cumulative and secondary impacts that included planned and approved projects in the vicinity of Kuikahi Village and future anticipated growth envisioned by the Urban and Rural Growth Boundaries in the MIP was provided in Chapter III. E. Future traffic projections and formed part of this assessment. Given the project area has not been in agricultural production for over 20 years, the loss of agricultural production from removing 14.9 acres of agricultural land from the current approximately 242,440 acres of land designated as "Agricultural" by the State Land Use Commission, is not considered a significant impact on agricultural productivity.

Comment:

30. Provide affordable workforce housing long-term rental units in the project.

Response:

The Applicant has reviewed the proposed affordable housing program for the project and while they support long-term affordable rentals, for the Kuikahi Village project, the project units will be for sale, to provide residents the opportunity to own their homes. It is noted that there are other long-term affordable rental projects that have been approved in the Central Maui area, including the Wailuku Apartments project, located east of the Kuikahi Village project.

DEPARTMENT COMMENTS

Comment:

1. Include the dimensions of the structures in the DEA and in Exhibit illustrations. Listing the number of stories for the structure, without their heights, is not sufficient to determine potential impacts.

Response: The preliminary project plans have been revised to include the number of stories and building heights. The revised plans will be included in Appendix "A" of the Final EA. Please see attached updated plans as Exhibit "B".

Comment:

2. On page 175 (Vol I), the DEA states that there will be no adverse effect on Scenic and Open Space Resources because, "The proposed dwelling designs are consistent with other similar developments in the vicinity of the proposed project and will conform to the Maui County Zoning Code for single-family and multi-family structures." You are seeking exemption from the Maui County Zoning Code, and so this statement is not correct.

Response: The Applicant completed a view analysis for the project, which included the existing homes north of Ku'ikahi Drive. It is noted that the grade for those existing homes are higher than Ku'ikahi Drive. See Exhibit "C".

Comment:

3. State in the DEA that no units will be used for any form of short-term rental use.

Response: The Final EA will note that the Applicant will commit to no short-term rental use being permitted in the Kuikahi Village units.

Comment:

4. If the live/work units must be considered home businesses to qualify the project as 100% workforce housing, adjust the DEA to reflect this. The Applicant stated on record at the UDRB meeting that the home business spaces could be used by the owner as an accessory dwelling for long-term rental use. In the DEA, you must anticipate the chances that all live/work units could be used as accessory dwellings to determine potential impacts and ensure the number of housing units are appropriately reflected. This

will change the number of dwellings approved for this project, the required parking, the population density, the traffic, and the impacts on infrastructure.

Response: Chapter I of the Draft EA notes that the business-related activities in the Live-Work units will need to be in compliance with MCC Chapter 19.67. The Final EA will include a discussion per the Applicant's comments on the option for the Live-Work units to be utilized for longterm residential rental and the potential impacts of this option.

Comment:

5. Though the Department does not recommend an exemption from the number of street trees planted, the Department is otherwise amenable to an exemption on landscaping requirements, but only to the extent that provides flexibility.

Response: The Applicant concurs with the Department's comment. The Applicant is requesting said exemption to provide flexibility in the location of street trees.

Comment:

6. State the exact minimum residential lot area proposed for MCC, Section 19.30A exemption, not approximations.

Response:

It is noted that the proposed project has conceptual plans developed with the single-family lots ranging in size from 4,600 square feet to 5,200 square feet at this point in time. The concept plans are meant to provide a high-level overview of the proposed project.

Comment:

7. The height must be measured from whatever is the lowest between the natural or finished grade. The exemptions requesting changes to maximum building heights, when the amount of fill is unspecified, could result in serious impacts. Raising the natural grade without regulation to an unspecified finished grade could result in excessive building elevation.

Response:

The Applicant noted that the proposed project is located on a sloping site, and to build roadways and homes, the civil engineering plan is anticipated to required excavation and embankment. The goal of the Applicant is to design a balanced site which requires the minimum fill possible.

Michele McLean, AICP, Director May 16, 2022 Page 13

Comment:

8. Ensure easily accessible bus stops are incorporated within the project.

Response:

There are existing bus stops in the project area. The nearest bus stop location is at the Kehalani Shopping Center, located to the east of the project site. The County of Maui, Department of Transportation, is responsible for determining locations of the bus stops, which we understand is determined by funding availability and route scheduling.

Thank you for your comments and participation the Draft EA review process. A copy of your letter and this response will be included in the Final EA.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

Attachments

cc: Linda Munsell, Department of Housing and Human Concerns (w/attachments)

Buddy Almeida, Department of Housing and Human Concerns (w/attachments)

Doyle Betsill, Kuikahi Properties, LLC (w/attachments)

Lawrence Carnicelli, Alaula Builders, LLC (w/attachments)

Ronald J. Ped, Architect (w/attachments)

Stacy Otomo, Otomo Engineering, Inc. (w/attachments)

Bill Mitchell, Hawaii Land Design (w/attachments)

Robert Hobdy, Biologist (w/attachments)

Mike Dega, Scientific Consulting Services (w/attachments)

Katherine Smith, Honu Media (w/attachments)

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EXHIBIT "A". AHUPUA'A BOUNDARY LINES MAP

Ahupua`a Boundary Lines Map

The project area does not occur on the boundary line (c. 300 ft to the north)

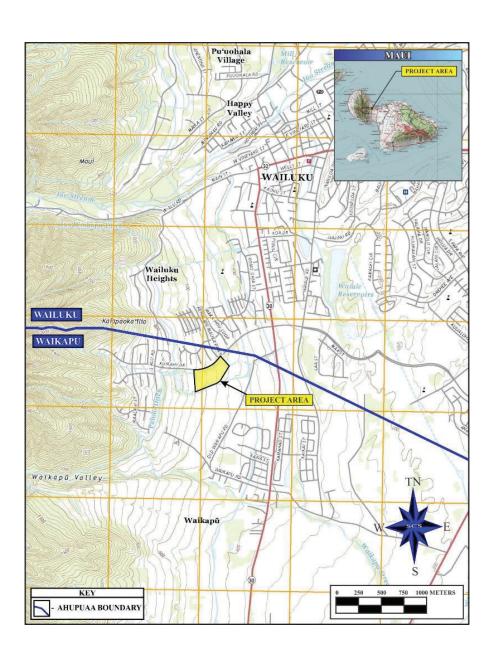


EXHIBIT "B". REVISED PROJECT PLANS





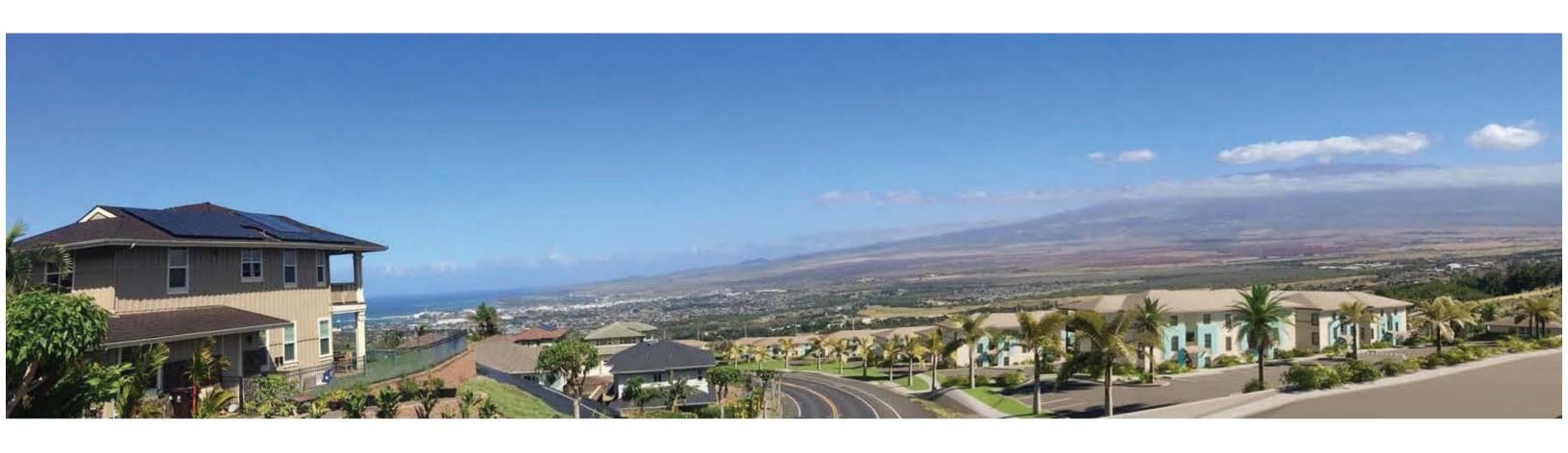






EXHIBIT "C". VIEW ANALYSIS





MICHAEL P. VICTORINO Mayor

MICHELE CHOUTEAU MCLEAN, AICP Director

JORDAN E. HART Deputy Director





DEPARTMENT OF PLANNING

COUNTY OF MAUI ONE MAIN PLAZA 2200 MAIN STREET, SUITE 315 WAILUKU, MAUI, HAWAII 96793 November 4, 2021

John Varel c/o Kuikahi Properties, LLC 191 Waihee Valley Road Wailuku, Hawaii 96793

Dear Mr. Varel:

SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED KUIKAHI AFFORDABLE HOUSING PROJECT, WAILUKU, MAUI, HAWAII; TMK: (2) 3-5-013:026 (POR.) (EAC 2021/0007)

At its regular meeting held on **November 2, 2021**, the Urban Design Review Board (UDRB) reviewed the plans for the project referenced above. After the presentation, discussion, and questions, the UDRB gave comments based on the limited information that was provided.

Overall, the UDRB agrees that this is a good project that is needed on Maui to fulfill the need for affordable housing. They appreciate the variety of housing types proposed. Out of the designs presented, they like the design of the studio units and single family dwellings the best, but encourage changes be made to the project. The UDRB recommends:

- 1) Incorporating design changes so that the project has a sense of place that is clearly indicative of Hawaii.
- 2) Incorporating design elements from the design guidelines for the various Country Town Business Districts in Maui County.
- 3) Removing the cupolas from all structures.
- 4) Redesigning the multi-story units so they are less boxy.
- 5) Considering ways to decrease the impact from the height of the units closest to Kuikahi Drive to the neighbors outside of the project, like those across Kuikahi Drive.

- 6) Ensuring future changes to all Kuikahi units and common areas maintain design continuity in perpetuity, whether through the bylaws of the association of condominium unit owners or some other regulatory means.
- 7) Ensuring a neat and clean environment by anticipating trash service and road maintenance needs if the roads cannot be dedicated to and serviced by the County of Maui.
- 8) Including alternatives to the proposed roundabout in the final EA, in the event a different traffic calming element is needed.
- 9) Ensuring connectivity to the existing infrastructure and future developments, including adding sidewalks along the front of the project adjacent to Kuikahi Drive.
- 10) Creating more green space.
- 11) Installing all utilities underground.
- 12) Returning to the UDRB for design review and recommendations when all unit designs and elevations are complete.

Thank you for your cooperation. Should you require further clarification, please contact Staff Planner Jared Burkett at jared.burkett@mauicounty.gov or at (808) 270-7378.

Sincerely,

CARYL HITCHCOCK-SPRINZEL, Chair Maui Urban Design Review Board

Con I. yell

Copy to: Clayton Yoshida, Planning Program Administrator (PDF)

Jared Burkett, Staff Planner (PDF)

Leilani Ramoran-Quemado, Secretary to Boards and Commissions (PDF)

Buddy Almeida, Housing Administrator, Department of Housing and Human Concerns (PDF)

Charlene Shibuya, Consultant, Munekiyo Hiraga (PDF)

Project File

CIY:JLB:rma

K:\WP_DOCS\Planning\EAC\2021\0007_KuikahiAffordableHsg\UDRB Comments.docx



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Caryl Hitchcock-Sprinzel, Chair Maui Urban Design Review Board One Main Plaza 2200 Main Street, Suite 315 Wailuku, Hawai'i 96793

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Ms. Hitchcock-Sprinzel:

Thank you for your letter dated November 4, 2021 summarizing comments from the Maui Urban Design Review Board (UDRB) on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

1. <u>Comment:</u> Incorporating design changes so that the project has a sense of place that is clearly indicative of Hawaii.

Response:

We appreciate the UDRB's suggestion regarding the project's design. The proposed Kuikahi Village project is proposed as a 100 percent affordable housing project. The Applicant is considering refinement of the project's design elements, keeping in mind the cost impacts of potential changes.

2. <u>Comment:</u> Incorporating design elements from the design guidelines for the various Country Town Business Districts in Maui County.

Response:

We note that the project area is not located within or adjacent to property zoned Country Town Business District. The existing and proposed developments are residential and commercial, and we would be curious to know if they were asked to utilize the design elements from the Country Town Business District. However, the Applicant and the design team considered refinements to the overall design and is proposing to update the plans to reflect elements of

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

www.munekiyohiraga.com

Hawai'i architecture that will not significantly increase the cost of the units. Changes to the plans include removal of cupolas on structures, incorporation of building treatments to provide a visual "break" to the structures and use of more muted earth tone colors for the buildings.

3. <u>Comment:</u> Removing the cupolas from all structures.

Response: The cupolas were proposed in order to provide natural ventilation for

the units. The Applicant considered alternative ways to ventilate the buildings and notes that that all cupolas have been removed from all

structures in the project.

4. Comment: Redesigning the multi-story units so they are less boxy.

Response: We appreciate the UDRB's comments regarding the multi-story

units. The Applicant has considered redesign of the multi-story units, however, the current design has been stylized so that it is most visually appealing while also being economical with its use of

materials.

Comment: Considering ways to decrease the impact from the height of the units closest to Kuikahi Drive to the neighbors outside of the project, like those across Kuikahi Drive.

Response:

We note that the existing neighborhoods across Ku'ikahi Drive are located at a higher elevation. See **Exhibit "A"**. The project team prepared a view analysis for the project with views from across Ku'ikahi Drive. Based on the analysis and the existing grade of the property, the proposed Kuikahi Village residences will be located at or below the height of the existing residences in the area. Please see attached view analysis prepared by the Applicant.

Comment: Ensuring future changes to all Kuikahi units and common areas maintain design continuity in perpetuity, whether through the bylaws of the association of condominium unit owners or some other regulatory means.

Response:

The Applicant confirms that the design of all residential units within the proposed Kuʻikahi Village Project will be included within the governing documents for the project. 7. <u>Comment:</u> Ensuring a neat and clean environment by anticipating trash service and road maintenance needs if the roads cannot be dedicated to and serviced by the County of Maui.

Response:

Thank you for the comment. The Applicant will include requirements for trash removal and road maintenance in the project's governing documents. A homeowner's association will be formed to manage the common areas and will be responsible for coordinating with the homeowners.

8. <u>Comment:</u> Including alternatives to the proposed roundabout in the final EA, in the event a different traffic calming element is needed.

Response:

Thank you for the comment. The project team will include a discussion on a possible four-way stop intersection at the project's lower driveway with Ku'ikahi Drive, in the Alternatives section of the Final EA.

9. <u>Comment:</u> Ensuring connectivity to the existing infrastructure and future developments, including adding sidewalks along the front of the project adjacent to Kuikahi Drive.

Response:

The Applicant is proposing to include a bicycle/pedestrian path along the project's frontage to Ku'ikahi Drive. At the project's lower intersection with Ku'ikahi Drive, where a roundabout is proposed, a pedestrian crossing will be included to allow for safe connection to the existing sidewalks along the north side of Ku'ikahi Drive.

10. Creating more green space.

Response:

The project site plan has been updated to outline the areas of green space proposed within the project. See **Exhibit "B"**. The park areas as well as the pedestrian path and spaces between the residences are proposed to be landscaped.

11. <u>Comment:</u> Installing all utilities underground.

Response: The Applicant confirms that all utilities will be installed underground.

Caryl Hitchcock-Sprinzel, Chair May 16, 2022 Page 4

12. <u>Comment:</u> Returning to the UDRB for design review and recommendations when all unit designs and elevations are complete.

Response:

Thank you for your comment. We appreciate the comments and suggestions by the Board. There is a great need for affordable housing in Maui County and the Applicant has shared the proposed plans with the surrounding community associations and community groups. The project team would like to proceed with the Maui County Code Chapter 2.97 Affordable Housing application in order to provide needed housing in a timely manner.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

Attachments

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns (w/attachments)

Doyle Betsill, Kuikahi Properties, LLC (w/attachments)

Lawrence Carnicelli, Alaula Builders (w/attachments)

Ron Ped, Ronald James Ped Architect, PC (w/attachments)

Stacy Otomo, Otomo Engineering, Inc. (w/attachments)

Bill Mitchell, Hawaii Land Design (w/attachments)

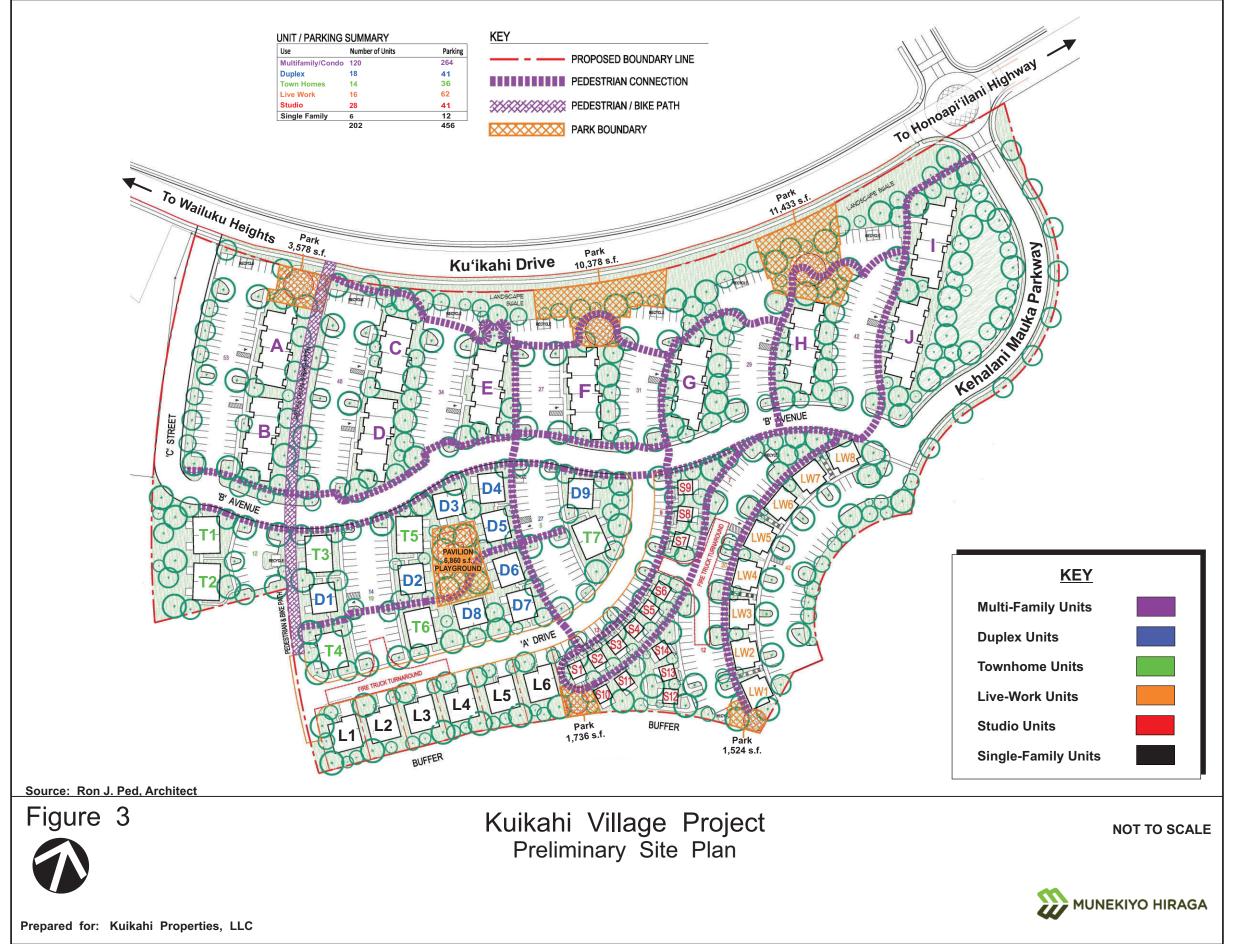
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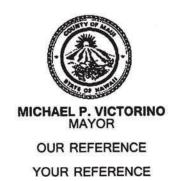
EXHIBIT "A". VIEW ANALYSIS





EXHIBIT "B". UPDATED SITE PLAN





POLICE DEPARTMENT

COUNTY OF MAUI

55 MAHALANI STREET WAILUKU, HAWAII 96793 (808) 244-6400 FAX (808) 244-6411



CHIEF OF POLICE

DEAN M. RICKARD

DEPUTY CHIEF OF POLICE

October 14, 2021

Ms. Charlene Shibuya Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, Hawaii 96793

Re: Draft Environmental Assessment and Maui County Code 2.97

Application for the Kuikahi Affordable Housing Project at

TMK: (2) 3-5-002:003 (por.), Wailuku, Maui, Hawaii

Dear Ms. Shibuya:

This is in response to your letter dated October 5, 2021 requesting comments on the Draft Environmental Assessment (EA) and Maui County Code Chapter 2.97 Fast-Tracked Residential Workforce Housing Application for the Kuikahi Affordable Housing project.

In review of the submitted documents, we have no objections to the upcoming construction project if it meets the minimal standards set forth by county codes and state laws. If the roads will be temporarily closed for alternating traffic, we ask the project manager utilizes flag men to conduct traffic control and have proper signage posted along the routes during construction.

Thank you for giving us the opportunity to comment on this project.

Sincerely,

Assistant John Jakobczak for: DEAN M. RICKARD

Acting Chief of Police

c: Buddy Almeida, DHHC



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

John Pelletier, Chief of Police County of Maui Police Department 55 Mahalani Street Wailuku, Hawai'i 96793

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment and Application for Maui County Code Chapter 2.97 Approval for the Proposed Kuikahi Village Residential Project at TMK

(2)3-5-002:003 (por.), Wailuku, Maui, Hawai'i

Dear Chief Pelletier:

Thank you for your Department's email dated October 14, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) as well as the Application for Maui County Code Chapter 2.97 Approval for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge that the Department has no objections to the proposed project. The Applicant confirms that construction of the project will meet minimal standards set forth by County codes and State laws. In addition, flagmen will be utilized to conduct traffic control and there will be proper signage posted throughout the temporary closure of nearby roads during project construction.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC

Lawrence Carnicelli, Alaula Builders

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

MICHAEL P. VICTORINO Mayor

ROWENA M. DAGDAG-ANDAYA Director

> JORDAN MOLINA Deputy Director

WADE SHIMABUKURO, P.E. Development Services Administration

RODRIGO "CHICO" RABARA, P.E. Engineering Division

JOHN R. SMITH, P.E. Highways Division

Telephone: (808) 270-7845 Fax: (808) 270-7955





COUNTY OF MAUI DEPARTMENT OF PUBLIC WORKS 200 SOUTH HIGH STREET, ROOM 434 WAILUKU, MAUI, HAWAII 96793

December 2, 2021

Ms. Charlene Shibuya, Senior Associate MUNEKIYO HIRAGA 305 High Street, Suite 104 Wailuku, Maui, Hawaii 96793

Dear Ms. Shibuya:

SUBJECT: KUIKAHI RESIDENTIAL PROJECT

TMK: (2) 3-5-002:003 (POR.) CHAPTER 2.97 APPLICATION

DRAFT ENVIRONMENTAL ASSESSMENT REVIEW

Our apologies for this late response. We have the following comments:

Located above the proposed Kuikahi Residential Project is Wailuku Water Reservoir 10, which
has been classified as a "high hazard" dam by the State of Hawaii Department of Land and
Natural Resources (DLNR). https://dlnreng.hawaii.gov/dam/hazard-classification/hazard-potential/

On September 4, 2021, DLNR sent Alaula Builders and Wailuku Water Company, LLC a notice of deficiency specifying that Wailuku Water Reservoir 10 "has been classified to be in UNSATISFACTORY overall condition and a threat to public safety due to one or more physical / operational conditions and deficiencies identified by the Department of Land and Natural Resources (Department)."

Even a non-deficient reservoir carries with it residual flood risk to nearby areas due solely to its presence.

Our department recommends further consultation with the State Department of Land and Natural Resources - Engineering Division and the County of Maui Department of Planning on the flood risk due to the Wailuku Water Reservoir 10.

Ms. Charlene Shibuya December 2, 2021 Page 2

Please call Deputy Director Jordan Molina at 270-7845 if you have any questions regarding this letter.

Sincerely,

FOR ROWENA M. DAGDAG-ANDAYA

Director of Public Works

RMDA:JM

xc: Highways Division

Engineering Division Department of Planning

State DLNR, Engineering Division, Flood Control & Dam Safety



Karlynn K. Fukuda PRESIDENT

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Jordan Molina, Director County of Maui Department of Public Works 200 South High Street, Room 434 Wailuku, Hawai'i 96793

SUBJECT:

Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-002:003 (por.), Wailuku, Maui,

Hawai'i

Dear Mr. Molina:

Thank you for your Department's letter dated December 17, 2021 providing the Department of Public Works (Department) comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter concerning the notice of deficiency sent from the Department of Land and Natural Resources (DLNR) on Wailuku Water Reservoir 10.

The Applicant and Wailuku Water Company will continue to work with the DLNR to explore alternatives to address deficiencies and reducing the height of the reservoir for possible declassification.

As noted in the Draft EA, the 18 million gallon per day inflow from the lao-Waikapu Ditch is controllable. Also, the Applicant will continue to work with your department on redirecting flows from the Wailuku Heights Subdivision that currently discharges into the reservoir, to a new, adequately sized retention basin. On February 25, 2021, the Applicant and its consultants met with the department and consultant to initiate coordination and discuss concepts for a potential location for a new retention basin.

We appreciate your input and will include a copy of your comment letter and this response in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders Stacy Otomo, Otomo Engineering

State DLNR, Engineering Division, Flood Control & Dam Safety K:\DATA\WV Regenesis\Wailuku AH\Applications\Response Letters - 2.97 and DEA\Subst Comments\DPW.docx

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

MICHAEL P. VICTORINO Mayor

MARC I. TAKAMORI Director

MICHAEL B. DU PONT
Deputy Director





DEPARTMENT OF TRANSPORTATION

COUNTY OF MAUI 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAI'I 96793

> TELEPHONE: (808) 270-7511 FAX: (808) 270-7505

> > October 28, 2021

Mr. Buddy Almeida, Housing Administrator County of Maui, Department of Housing and Human Concerns 2200 Main Street, Suite 546 Wailuku, Maui, HI 96793

Email: Buddy.Alemeida@co.maui.hi.us

Ms. Charlene Shibuya, Senior Associate Munekiyo Hiraga 305 High Street, Suite 104 Wailuku, HI 96793

Email: planning@munekiyohiraga.com

SUBJECT: Draft Environmental Assessment and Maui County Code 2.97 Application for the

Kuikahi Affordable Housing Project at TMK (2)3-5-002:003 (por.), Wailuku, Maui Hawaii

Dear Mr. Almeida,

Thank you for the opportunity to review and comment on this project. We have no comments to make at this time.

Please feel free to contact me if you have any questions.

Sincerely,

Marc Takamori

Director

cc: Charlene Shibuya, Munekiyo Hiraga



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP
VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Marc Takamori, Director County of Maui Department of Transportation 110 'Ala'ihi Street, Suite 210 Kahului, Hawai'i 96732

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment and Application for Maui County Code Chapter 2.97 Approval for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Mr. Takamori:

Thank you for your letter dated October 28, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) as well as the Application for Maui County Code Chapter 2.97 Approval for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge that the Department has no comments on the proposed project.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

Tyler Fujiwara and Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

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Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

MICHAEL P. VICTORINO Mayor

JEFFREY T. PEARSON, P.E. Director

HELENE KAU

Deputy Director





DEPARTMENT OF WATER SUPPLY COUNTY OF MAUI 200 SOUTH HIGH STREET WAILUKU, MAUI, HAWAI'I 96793

November 9, 2021

Mr. Buddy Almeida, Housing Administrator
DEPARTMENT OF HOUSING AND HUMAN CONCERNS

via email: buddy.almeida@co.maui.hi.us

Dear Mr. Almeida:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT (EA) AND MAUI COUNTY CODE 2.97

APPLICATION FOR THE KUIKAHI AFFORDABLE HOUSING PROJECT

TMK: (2) 3-5-002:003 (por.), Wailuku, Maui, Hawaii

Thank you for the opportunity to review and comment on the subject project, which includes the construction of 120 multi-family units, 6 single-family units, 34 duplexes, 16 live-work units, and 28 studios. The project is proposing a 2-lot subdivision: (a) the 14.950-acre project site; and (b) the remaining 133.06 acres to be processed under Maui County Code 2.97.

Subdivision Water System Improvements

Under MCC 2.97, the project is proposing to request an exemption to defer subdivision water system improvements, however there are only 2 scenarios in Title 14 – Water Code of the Maui County Code (MCC) that allow for deferral of subdivision improvements: (a) MCC 14.05.110 - Construction agreement and bond of water system improvements, which allows deferral "by entering into an agreement with the department to make, install and complete all of the required water system improvements within a specified time, and filing with the department a surety bond or other security"; and (b) MCC 14.05.180 - Deferral, which allows the deferral "for the sole and limited purpose of authorizing a transfer of real property interest from the subdivider to family members". Unless the project, qualifies under 1 of the 2 scenarios, the subdivider shall complete all required water system improvements for subdivision approval.

The subdivider shall comply with Chapter 14.05 – Subdivision Water System Requirements, as amended, including but not limited to the following:

- MCC 14.05.020 Reservoirs/storage tanks, as amended. The project may be required to construct a storage tank, however if "storage" credits are applicable to the project, the subdivider shall provide a valid agreement pursuant to MCC 14.07.100 Application of credit
- MCC 14.05.060 Laterals, as amended. There is no existing water lateral installed for and no
 existing water meters assigned to the subject property, therefore, the subdivider shall install a
 water service lateral for each subdivision lot, including installation of a Department approved
 backflow prevention device on the consumer side of the water meter.

Mr. Buddy Almeida Draft EA and MCC 2.97 Application Kuikahi Affordable Housing Project TMK (2) 3-5-002:003 (por.) November 9, 2021 Page 2

- MCC 14.05.090 Fire protection, as amended. The existing water system is not adequate in providing the minimum fire flow for the subdivision, therefore the subdivider shall install approximately 1,000-feet of new 12-inch waterline along Kuikahi Drive with fire hydrants spaced at 250 feet. Since the proposed main extension would result in a dead-end, a water line interconnection is required between the new 12-inch waterline along Kuikahi Drive and the existing 12-inch waterline at the intersection of Kehalani Mauka Parkway and Kauna Lipo Drive, to prevent stagnation of the water.
- MCC 14.05.120 Construction plans, as amended. Prior to commencement of construction, all water system improvements require submittal of construction plans (24"x36") stamped and signed by a licensed engineer for the Department's review and approval, in accordance with Section 112 Construction Plans of the Water System Standards 2002, as amended. Construction work shown on the approved plans shall be completed by a licensed contractor at the property owner's expense.
- MCC 14.05.140 Installation of water service, as amended. All subdivision water system improvements shall be completed and accepted by the Department prior to approval of water service (water meter).
- MCC 14.05.170 Ownership of installed water system improvements, as amended. The subdivider shall provide perpetual easements for all portions of the water system improvements installed in other than publicly owned right-of-ways.

Request for Water Service

The subdivider shall comply MCC 14.04 – Water Services, as amended. As previously stated, MCC 14.05.140 – Installation of water service, as amended, requires all subdivision water system improvements to be completed and accepted by the Department prior to approval of water service (water meter).

The subdivider shall comply with the County of Maui Administrative Rules, Title 16, Chapter 201, "Rules Relating to Water Service", as amended, which defines a "large quantity of water" request and provides the criteria for uniform handling for water service. For 2021, requests for water service from Central Maui Water System is determined to be requesting a "large quantity of water", if the request is more than 5,400 gallons per day (gpd).

- 14.950-acre lot: This lot may qualify as an exception to the Administrative Rules by submitting
 a copy of an executed, recorded, and valid residential workforce housing agreement between
 the developer and the County to the Department of Water Supply. If the subdivision is not
 able to provide this agreement, the subdivider shall provide source to serve this lot.
- 133.06-acre lot: This lot does not qualify as an exemption to the Administrative Rules, however, under these rules water usage for large lot subdivisions, as defined in MCC 18.16.270, may be based on the minimum requirement for one dwelling per lot, which is 600 gallons per day (ref: Table 100-18 of the Water System Standards 2002, as amended). If the subdivision does not meet the definition of a large lot subdivision, the estimated water demand based estimated water usage of 5,000 gpd/acre for agricultural zoning (ref: Table 100-18 of

Mr. Buddy Almeida Draft EA and MCC 2.97 Application Kuikahi Affordable Housing Project TMK (2) 3-5-002:003 (por.) November 9, 2021 Page 3

the Water System Standards 2002, as amended) is 665,300 gpd (5000 gpd/acre x 133.06 acres). Since this amount exceeds the current 2021 limit of 5,400 gpd, the subdivider shall provide source to serve this lot.

The subdivider shall comply with MCC 14.07 – Water System Development Fees, as amended. Under Maui County Code 2.97, the project is proposing to request an exemption from payment of the water system development fee under MCC 14.07.030 – Water system development fee schedule, however, pursuant to MCC 2.97.150, water fees under Title 14 - Water Code are not listed as an eligible fee waiver

The subdivider shall comply with MCC 14.10 – Temporary meter charges, as amended. Under Maui County Code 2.97, the project is proposing to request an exemption from payment of temporary meter charges under MCC 14.10.040 – Temporary meter charges, however, pursuant to MCC 2.97.150, water fees under Title 14 - Water Code are not listed as an eligible fee waiver.

If you have any questions, please contact Tammy Yeh of our Engineering Division at (808) 270-7835 or at tammy.yeh@co.maui.hi.us. Engineering Division's main number is (808) 270-7835.

Sincerely,

WENDY TAOMOTO, P.E.

Engineering Program Manager

TY

cc: Charlene Shibuya, MUNEKIYO HIRAGA (<u>planning@munekiyohiraga.com</u>)

DWS Water Resources Division, (water.resources@mauicounty.gov)



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP

VICE PRESIDENT

May 16, 2022

Wendy Taomoto, P.E., Engineering Program Manager Department of Water Supply County of Maui 200 South High Street, 5th Floor Wailuku, Hawaii 96793

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Ms. Taomoto:

Thank you for your letter dated November 9, 2021 providing the Department of Water Supply's (Department) comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter.

Subdivision Water System Improvements

Under Title 14 – Water Code of the Maui County Code (MCC) that allows for deferral of subdivision improvement, the property owner will enter into an agreement with the Department to make, install, and complete all the required water system improvements within a specified time, and file a surety bond.

Concerning compliance with Chapter 14.05 – Subdivision Water System Requirements, as amended:

- MCC 14.05.020 Reservoirs/storage tanks, as amended. "Storage" credits
 of 137,500 gallons were purchased by the Applicant along with the property
 (TMK (2)3-5-002:003) with an option to purchase an additional 86,500
 gallons from the previous property owner. The credits available are
 expected to be adequate to serve the project's estimated domestic and
 irrigation demand.
- MCC 14.05.020 Laterals, as amended. The project intends to install necessary laterals and water meters to service the 14.950-acre lot. Laterals and water meters to service the 133.06-acre lot will be deferred until further development of the lot.

Maui: 305 High Street, Suite 104 • Wailuku, Hawaii 96793 • Tel: 808.244.2015 • Fax: 808.244.8729

Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

- MCC 14.05.090 Fire protection, as amended. The project will provide the
 minimum fire flow by satisfying the Department's requirements to install
 approximately 1,000 feet of new 12-inch waterline along Ku'ikahi Drive with
 fire hydrants at 250 feet spacing. An interconnection will be added between
 the new 12-inch waterline and existing 12-inch waterline at the intersection
 of Kehalani Mauka Parkway and Kuana Lipo Drive to prevent stagnation of
 the water.
- MCC 14.05.120 Construction plans, as amended. Construction plans (24"x36") stamped and signed by a licensed engineer, for all water system improvements will be submitted for the Department's review and approval, in accordance with Section 112 – Construction Plans of the Water System Standards 2002, as amended. All improvements shall be completed by a licensed contractor at the property owner's expense.
- MCC 14.05.140 Installation of water service, as amended. The Applicant will comply with the provision of the Code. All subdivision water system improvements shall be completed and accepted by the Department prior to approval of water service.
- MCC 14.05.170 Ownership of installed water system improvements, as amended. The Applicant will comply with this section of the Code and shall provide perpetual easements for all portions of the water system improvements installed in areas other than publicly owned rights-of-way.

Request for Water Service

As stated above, MCC 14.05.140 – Installation of water service, as amended, will be complied with.

The Applicant will comply with the County of Maui Administrative Rules, Title 16, Chapter 201, "Rules Relating to Water Service", as amended, which defines a "large quantity of water" request.

- 14.950-acre: For this lot, the Applicant intends to execute and record a
 Residential Workforce Housing Agreement with the Department of Housing
 and Human Concerns, immediately after the Maui County Council approves
 of the MCC 2.97 Residential Workforce Housing application and passes
 the resolution. Therefore, an exception to the Administrative Rules is
 intended.
- 133.06-acre lot. This lot can be considered a large lot and therefore, the minimum water requirement is 600 gallons per day, which is less than the 5,400 gallons per day that the Applicant would need to provide a source to serve the lot.

Wendy Taomoto, P.E., Engineering Program Manager May 16, 2022 Page 3

Finally, although MCC Title 14 is not specifically listed in MCC 2.97.120 – Exemptions, the Code does state that the exemptions or modification may include Title 19, Title 18, Chapter 2.80B, and Chapter 19.68, but shall not be limited to those listed. As such, the developer will respectfully request the Maui County Council's approval to grant exemptions to MCC Title 14 – Water Code concerning the water system development fees per MCC 14.07.030 and temporary meter charges per MCC 14.10.040.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders Stacy Otomo, Otomo Engineering, Inc.

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Maui Economic Opportunity, Inc.



P.O. Box 2122 Kahului, HI 96733 808-249-2990 Fax: 808-249-2991 www.meoinc.org

October 7, 2021

County of Maui Department of Housing and Human Concerns 2200 Main St., Suite 546 Wailuku, HI 96793

Re: Draft Environmental Assessment for the Kuikahi Affordable Housing Project at TMK (2)3-5-002:003 (por.), Wailuku, Maui, Hawaii

To Whomever It May Concern:

Maui Economic Opportunity's community needs survey shows the lack of affordable housing to be a top priority community concern. As part of the national Community Action Partnership, MEO has worked for more than five decades to reduce the impacts of poverty in Maui County. Through our rental assistance offerings, Head Start preschool program for low income families and paratransit services, MEO staff sees firsthand the worries families face over the high cost of housing and looming threat of homelessness.

MEO strongly supports this needed project. Its diverse mix of housing options from studios to live-work units will serve the needs and desires of various individuals and families seeking housing. The project is 100 percent affordable for families between 60 percent and 140 percent of the Area Median Income. For a family of four, 60 percent is only \$61,980 annually for the area.

In addition, the project is properly placed, across the street from residential housing and in the vicinity of schools, a supermarket and drug stores.

Thank you for allowing us to comment on this much needed affordable housing project.

Sincerely,

Debbie Cabebe, SHRM-SCP Chief Executive Officer

Cc: Munekiyo Hiraga

The Promise of Community Action

Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.





Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

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Debbie Cabebe, Chief Executive Officer Maui Economic Opportunity, Inc. P.O. Box 2122 Kahului, Hawai'i 96733

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Ms. Cabebe:

Thank you for your letter dated October 7, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we acknowledge and appreciate the MEO's support for the proposed Kuikahi Village Project. As you mention, the proposed project will provide a variety of housing options that will be affordable to low-income families. The location of the proposed project is near other residential housing subdivisions, as well as schools, local businesses, and State/County agencies.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli. Alaula Builders

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

WAILUKU HEIGHTS EXTENSION COMMUNITY ASSOCIATION

Post Office Box 968 Wailuku, Maui, Hawaii 96793

October 27, 2021

VIA E-MAIL--BUDDY.ALMEIDA@CO.MAUI.HI.US

Mr. Buddy Almeida Housing Administrator County of Maui 2065 Main Street Suite 108 Wailuku, Maui, Hawaii 96793

RE: Kuikahi Affordable Housing

Dear Mr. Almeida:

Thank you for the opportunity to comment on this affordable housing project. Wailuku Heights Extension Community Association supports the development of affordable housing at this location. We believe there is a critical need for places to live for our young and working families and believe that this would make a substantial contribution to meeting needed housing demand for our young people.

Due to the needed density of the project, we believe the following concerns should be addressed:

1. Businesses in a residential district. Members of our Board felt that businesses in a residential district may not be appropriate. While we understand the concept of live-work scenarios in community planning, we have ourselves encountered problems with businesses operating within our existing subdivision, contrary to our CC&Rs and possibly County Codes. While good in concept, in practice we have seen areas where this has not worked out, and we have experienced parking and congestion resulting from the practice in our own area.

Perhaps increasing the utility of these units as pure affordable units may be a better contribution than forcing a concept into an area where it probably will not work. Note the vacancies in the makai project area just below us in Maui Lani. Vacant investments in housing benefit no one. Mixed use is more valuable when entire districts are incorporated such as in Wailuku Town proper as an excellent example of where it works. Isolated live work may not work as there is little traffic for businesses to thrive on and business customers will have to commute into the neighborhood to gain access, the opposite of what you want. We feel it should be kept residential.

Mr. Buddy Almeida October 27, 2021 Page 2

2. Due to the density of the project with over 400 units, traffic mitigation at the intersection of Kuikahi Drive will be critical in insuring that both pedestrians and vehicles can traverse the area with minimal backups and intrusion and optimal safety. A round-about, though expensive, may be a good solution. We feel that a roundabout should not be made to be prohibitively expensive (or perhaps should be absorbed by the county housing division) and that a simple well designed, low maintenance roundabout could be supported. This would allow through traffic to traverse the intersection with less backups as opposed to traffic lights. We feel the roundabout at Maui Lani Parkway is an excellent template which could be used to minimize design costs for future roundabouts. Safety for children would be a major consideration as we do not want pedestrian accidents in this intersection. The roundabout should be designed to maximize safety for pedestrians, perhaps supplemented with crossing warning flashing lights as per Maui Lani.

We support this project for the positive benefits it will provide for those who have not obtained needed housing, especially our young people. Please insure that it goes to those who truly need it as opposed to offshore investors and speculators.

Mahalo and Aloha.

/s/ Wayne N. Hedani

Wayne N. Hedani President WHECA Phase I

cc: WHECA Phase I Board of Directors



Karlynn K. Fukuda
PRESIDENT

Mark Alexander Roy AICP, LEED AP
VICE PRESIDENT

Tessa Munekiyo Ng AICP

Michael T. Munekiyo AICP

VICE PRESIDENT

May 16, 2022

Wayne N. Hedani, President Wailuku Heights Extension Community Association P.O. Box 968 Wailuku, Hawai'i 96793

SUBJECT: Chapter 343, Hawai'i Revised Statutes Draft Environmental

Assessment for the Proposed Kuikahi Village Project at TMK (2)3-5-

002:003 (por.), Wailuku, Maui, Hawai'i

Dear Mr. Hedani:

Thank you for your letter dated October 27, 2021 providing comments on the Chapter 343, Hawai'i Revised Statutes Draft Environmental Assessment (EA) for the proposed Kuikahi Village Project in Wailuku, Maui, Hawai'i. On behalf of Kuikahi Properties LLC (Applicant), we offer the following information in response to the comments noted in your letter. The responses follow the order provided in the comment letter.

1. <u>Comment:</u> Businesses in a residential district. Members of our Board felt that businesses in a residential district may not be appropriate. While we understand the concept of live-work scenarios in community planning, we have ourselves encountered problems with businesses operating within our existing subdivision, contrary to our CC&Rs and possibly County Codes. While good in concept, in practice we have seen areas where this has not worked out, and we have experienced parking and congestion resulting from the practice in our own area.

Perhaps increasing the utility of these units as pure affordable units may be a better contribution than forcing a concept into an area where it probably will not work. Note the vacancies in the makai project area just below us in Maui Lani. Vacant investments in housing benefit no one. Mixed use is more valuable when entire districts are incorporated such as in Wailuku Town proper as an excellent example of where it works. Isolated live work may not work as there is little traffic for businesses to thrive on and business customers will have to commute into the neighborhood to gain access, the opposite of what you want. We feel it should be kept residential.

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Oahu: 735 Bishop Street, Suite 412 • Honolulu, Hawaii 96813 • Tel: 808.983.1233

Response:

The proposed Live-Work units are intended to allow home businesses in compliance with Maui County Code (MCC) Section 19.67. In this section of the MCC, there are standards and restrictions such as the amount of traffic generated not greater than expected in the neighborhood, 8:00 am - 7:00 pm hours of operation, maximum of four (4) spaces on-site parking allowed with no street parking permitted, only one employee allowed other than the resident, floor area restricted to 40% for home business, no more than two (2) customers at a time not to exceed sixteen (16) customers per day, no nuisance businesses permitted, etc. An enforcement provision is also included in the MCC which provides for action against home businesses proven to cause a nuisance. Thus, the Applicant envisions a very different scenario from unpermitted or unregulated home businesses or businesses that are in commercial areas.

2. **Comment:** Due to the density of the project with over 400 units, traffic mitigation at the intersection of Kuikahi Drive will be critical in insuring that both pedestrians and vehicles can traverse the area with minimal backups and intrusion and optimal safety. A round-about, though expensive, may be a good solution. We feel that a roundabout should not be made to be prohibitively expensive (or perhaps should be absorbed by the county housing division) and that a simple well designed, low maintenance roundabout could be supported. This would allow through traffic to traverse the intersection with less backups as opposed to traffic lights. We feel the roundabout at Maui Lani Parkway is an excellent template which could be used to minimize design costs for future roundabouts. Safety for children would be a major consideration as we do not want pedestrian accidents in this intersection. The roundabout should be designed to maximize safety for pedestrians, perhaps supplemented with crossing warning flashing lights as per Maui Lani.

Response: We note that the proposed project involves the development of 202 affordable housing units. As recommended in the project's Traffic Impact Assessment Report, the proposed roundabout requires that certain design parameters be satisfied. Close coordination will continue with the Department of Public Works to ensure a feasible. cost effective, and safe design for school children to cross Ku'ikahi Drive.

3. **Comment:** We support this project for the positive benefits it will provide for those who have not obtained needed housing, especially our young people. Please insure that it goes to those who truly need it as opposed to offshore investors and speculators.

Wayne N. Hedani, President May 16, 2022 Page 3

Response:

We appreciate the Association's support for the proposed project. The Kuikahi Village project is 100 percent affordable to low-income families and individuals (those within the 60 to 140 area median income range), the Applicant will ensure that the units at the proposed project will not be available for offshore investors and speculators through the required lottery process for the units. Further, MCC, Chapter 2.96 requires that for-sale units be kept as affordable units for a minimum time period ranging from five (5) years to 10 years.

We appreciate your input and will include a copy of your comment letter and this response letter in the Final EA for the project. Should you have any questions or require additional information, please feel free to contact me at (808) 244-2015, extension 219.

Very truly yours.

Charlene S. Shibuya Senior Associate

CSS:ab

cc: Linda Munsell, County of Maui, Department of Housing and Human Concerns

Doyle Betsill, Kuikahi Properties, LLC Lawrence Carnicelli, Alaula Builders

Tyler Fujiwara, Austin, Tsutsumi & Associates, Inc.

Kelcee Fujimoto, Austin, Tsutsumi & Associates, Inc.

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Subject: KUIKAHI VILLAGE

From: Kaniloa Kamaunu < bkofmor@gmail.com >

Sent: Sunday, March 6, 2022 5:08 PM

To: Karlynn Fukuda < <u>karlynn@munekiyohiraga.com</u>>; <u>mike@scshawaii.com</u>

Subject: KUIKAHI VILLAGE

KUIKAHI VILLAGE Aloha Mai Kakou.

This letter is in response to the Kuikahi Village Affordable housing project. On Wednesday January 26, 2022 6pm Aha Moku 'O Wailuku (AMOW) held its monthly General meeting on Zoom. Karlynn Fukuda of Munekiyo and Hiraga (M&H) as well as Lawrence Carnecelli VP of Development-Alaula Builders and Micheal Dega Archeologist of Scientific Consultant Services (SCS) Inc made a presentation of the above mentioned project to the Aha. Members of the Maui community participating were myself Kaniloa Kamaunu AMOW Rep, Clare Apana, Carol Kamekona, Noelani Ahia, Ellie Rae and John Kahawaii.

After the meeting community participants requested from the development team more information on project. Upon request Karlynn Fukuda M&H and Micheal Dega SCS shared their documents and I gave copies to those AMOW participants. After these many weeks I have gather these responses from those who participated in that meeting and are now forwarding to Karlynn Fukuda of M&H through email.

Clare Apana: My comment is questioning whether the drainage is adequate and asking for scientific study/proof that the ground water etc. will be handled. Also noting that there were no archaeological features or sites found in all of those acres. Thirdly the maps of the soil content absolutely shows something different than what you shared. Do you have old maps that you can look at the sand study. I have more concerns and will add to them later when I get to read a little more of the report.

Noelani Ahia: My comments are directed to Mike Dega of SCS. I see there is a need to have the LCA's translated and presented to us. Also, I would like to see the finds from the previous archeology mapped so we can visually see the relationship. The map should include finds in adjacent parcels, as far over as the golf course that Aunty Clare referenced had significant finds and also at least as far as the area to the north.

AMOW is aware of the concerns for affordable housing needed here on Maui, but due to these concerns we of AMOW cannot support this project. We'd like to express our mahalo for allowing us to participate.

Mahalo Nui.

Kaniloa Kamaunu AMOW Representative



Karlynn K. Fukuda

Mark Alexander Roy AICP, LEED AP VICE PRESIDENT

Tessa Munekiyo Ng AICP VICE PRESIDENT

Michael T. Munekiyo AICP SENIOR ADVISOR

May 16, 2022

Via email: bkofmor@gmail.com

Aha Moku 'O Wailuku c/o Kaniloa Kamaunu

SUBJECT: Proposed Kuikahi Village Affordable Housing Project

Dear Aha Moku 'O Wailuku members,

Thank you for meeting with the project team for the proposed Kuikahi Village project virtually at our Zoom meeting on January 26, 2022. We appreciated the opportunity to present the project information to you on the 100% affordable housing project. We are in receipt of the email from Kaniloa Kamaunu on March 6, 2022, with the comments from the Aha Moku 'O Wailuku (AMOW) on the Kuikahi Village project.

Please find attached a letter from Mike Dega of Scientific Consulting Services (SCS), the project's archaeologist, responding to the comments received in the March 6, 2022 email.

The Preliminary Engineering Report (PER) that was provided to the AMOW via email on February 1, 2022 was included in the project's Draft Environmental Assessment (EA) document. The PER was prepared following the regulations and standards required by the County of Maui. It is noted that the PER concluded that with the proposed drainage improvements for the Kuikahi Village project, the level of runoff leaving the project area, would be less than the current flow through the site. Please see page 8 of the PER.

We appreciate the opportunity to meet with the AMOW and for your comments on the project. A copy of the comments and this response will be included in the Final EA document for the project.

Very truly yours,

Charlene S. Shibuya Senior Associate

CSS:ab

Cc: Doyle Betsill, Kuikahi Properties (w/attachment)

Lawrence Carnicelli, Alaula Builders (w/attachment)

Mike Dega, Scientific Consulting Services (w/attachment) Stacy Otomo, Otomo Engineering, Inc. (w/attachment)

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Aloha Aha Moku O Wailuku,

Mahalo for the comments and for your time during the presentations. We take all your comments seriously and will do our best to address each. Per the archaeological portion of your comments, three items appear to need clarification or comment:

- 1. Discuss the project area and presented soil maps
- 2. Provide full details and translations of the discussed Land Commission Awards
- 3. Provide maps of previous archaeology in nearby environs to assess the project area and relationship with these sites.

Soil types

As noted during the presentation, soil types in and around the project area are consistent with 'lao cobbly silty clay (IbB), 'lao clay (IcC), and 'lao cobbly silty clay (IbC). The closest sand, of the Puu One series, occurs at a minimum c. 1.5 km to the east, makai of the Honoapi'ilani Highway.

The 'lao sediments noted for the project area were also confirmed during trenching during previous projects, including the current project area, to the north and south flanks of the current Kuikahi Village project area (Dega 2004; Wilson and Dega 2005).

Multiple trenches and stratigraphic profiles are available as empirical evidence to show the absolute lack of sand in the project area. Both reports are available if one would like to review the results of the excavation for both projects.

Land Commission Awards

As discussed during the presentation, there are no land commission awards or royal patents for the Kuikahi Village project area. Nor are there LCA nor royal patents within the total 148-acre subject parcel of which the Kuikahi Village project area is located.

We did share with AMOW that there are several LCA around the project area, which were summarized during the presentation. These include LCA 326, 71, and 387. Three royal patents for these three LCA's were also issued for lands outside the current project area and subject parcel: 1925, 4549, and 7659. To the south of the current project area, three LCA are present: 433, 3201, and 3525.

All these LCA and royal patents were summarized as associated with Historic era land use in the greater Waikapu area. No burials were noted in any of these LCA nor were any traditional sites or customary areas.

The community may investigate these LCA and royal patents for free using the Office of Hawaiian Affairs Kipuka Database: http://kipukadatabase.com. This is an excellent, easy to use, free database to explore LCA's across the state.

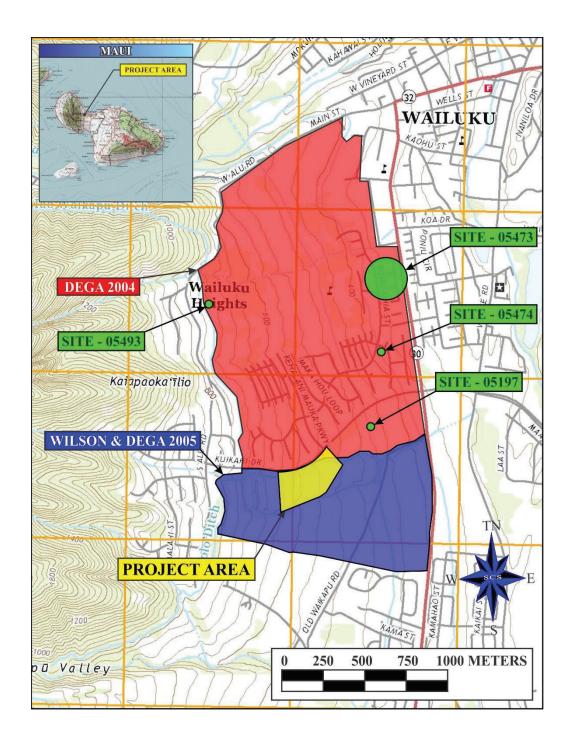
Per the current project area and subject parcel, there are no associated LCA or royal patents.

Previous Archaeology

The presentation also discussed previously documented archaeological sites near the current project area (none have been identified through previous archaeological projects in the Kuikahi project area). The map shown below was presented, along with descriptions of the sites that were identified. These sites represent the most accurate picture of the types of sites occurring in the vicinity of the project area.

There are archaeological sites aka historic properties occurring far outside this area. While we acknowledge your desire to know about sites occurring miles away in different terrain, elevations, and climate, these sites are decidedly different, such as those associated with sand hills (burials) or upland forests (temporary habitation loci). All the sites in the vicinity of the project area are related to Historic era cultivation and occupation and form a better picture of what could occur in the current project area.

Mahalo,	
Mike Dega	
SCS Hawaii	



REFERENCES

XII. REFERENCES

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